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EXHIBIT D-1

(US Fee and Expense Statements)¹

Amounts in these fee statements are exclusive of the \$100.40 fee reduction and \$1,023.19 expense reimbursement reduction agreed upon by DLA Piper and the fee examiner.

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General Invoices



DLA Piper (US) J. Lyons T 312-368-4000

PRIVILEGED AND CONFIDENTIAL

Jonathan King, Chapter 7 Trustee DLA Piper, LLC 444 West Lake Street Suite 900 Chicago, IL 60606

Jonathan King, Chapter 7 Trustee **Client Name**

Matter Name Chapter 7

Matter Number 411031.000003

INVOICE # 883383322 **Invoice Date** June 17, 2025

For Professional Services through March 31, 2025

829,925.00 Fees Disbursements 40,361.22 **TOTAL THIS INVOICE** USD 870,286.22

Please remit payment	by]	July	17, 2025
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Please se	Please send remittance instructions to <u>accounts@us.dlapiper.com</u>				
Pay Online Pay online	Click the "Pay online" button or visit https://paymentportal.dlapiper.com to make a payment online using your bank account or credit card	The invoice number 883383322 and invoice amount 870286.22 is required for access to the payment center.			
Payment via Wire/ACH	Wells Fargo Bank, N.A. 1700 K Street, NW, 9th Floor Washington, DC 20006 Account Name: DLA Piper LLP (US)	To ensure proper credit, please indicate the invoice number(s) on the wire or ACH			
	Account No.: 4053611935 ABA Transit No.: 121000248 Swift Code: WFBIUS6S	Law Firm Tax Identification No.: 52-0616490			
Payment via Check to Lockbox	DLA Piper LLP (US) P.O. Box 780528 Philadelphia, PA 19178-0528	Please do not send checks to firm office address.			

FEE DETAIL

The following legal services were provided by DLA Piper LLP (US):

B110 Case Administration

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/11/24	Emails with G. Juell regarding status of budget motion.	William L. Countryman	0.20	103.00
10/11/24	Revise draft budget motion and related background.	Gregory M. Juell	4.40	5,346.00
10/17/24	Review of .	John Lyons	3.50	6,282.50
10/18/24	Correspondence with J. Lyons regarding status and workstreams (0.5); revise draft budget motion (2.2) and correspondence with D. Moshayedi re same and next steps (0.4).	Gregory M. Juell	3.10	3,766.50
11/08/24	Case update call with fee examiner.	John Lyons	0.50	897.50
11/18/24	Review of P. Anderson request and began drafting update.	John Lyons	2.10	3,769.50
11/19/24	Continued revisions to P. Anderson update.	John Lyons	2.10	3,769.50
11/20/24	Finalized update email, comments from J. King and transmittal to P. Anderson.	John Lyons	2.10	3,769.50
12/22/24	Comprehensive review of .	John Lyons	4.50	8,077.50
12/23/24	Detailed review of fees and calculations, creditor recoveries, sensitivity analysis (3.2), merits of mediator number and other scenarios (1.1), CAVIC contingent fee and recoveries and next steps (2.3).	John Lyons	6.40	11,488.00
12/26/24	Review of UL settlement and issues regarding and related issues (2.3); analysis of case strategies/objection strategies regarding mediator proposal and approval steps (3.2); review of professional fees, holdback, effect of distribution scenarios (1.8).	John Lyons	7.30	13,103.50
12/31/24	Review of fee calculation issues, holdbacks, distribution metrics and holdback issues (2.1), New Target fees and judgment inclusion (1.1) and case closing issues (.8).	John Lyons	4.00	7,180.00
01/02/25	Detailed review of scenarios.	John Lyons	5.50	11,275.00
01/06/25	Review of updated information regarding scenarios.	John Lyons	3.20	6,560.00
01/25/25	Detailed review of scenarios.	John Lyons	4.00	8,200.00

01/27/25	Review and analyze remaining open issues on all litigations and open matters and claims process and formulate next steps on same (1.3); confer with J. King regarding same (0.4).	Jeffrey S. Torosian	1.70	3,213.00
01/28/25	Meeting with trustee regarding settlement and case closure options.	John Lyons	1.00	2,050.00
01/28/25	Review of and next steps.	John Lyons	4.50	9,225.00
01/28/25	Emails and call with J. King and J. Lyons regarding overall case management, claims process, and next steps.	Jeffrey S. Torosian	1.50	2,835.00
02/04/25	Receipt and review of Court Notice on reassignment of cases and emails from J. Lyons and R. Sokol regarding same and next steps (0.5).	Jeffrey S. Torosian	0.50	945.00
02/05/25	Review and analyze research on (1.2); consider strategy with respect to next steps on litigations and bankruptcy proceedings as a result (0.6); instructions to DLA team regarding same (0.3).	Jeffrey S. Torosian	2.10	3,969.00
02/05/25	Analyze and strategy regarding same.	Joe Roselius	0.10	150.50
02/05/25	Review of steps.	John Lyons	1.50	3,075.00
02/06/25	Continued work on (3.1); review of (1.2).	John Lyons	4.30	8,815.00
02/07/25	Review and comments to UST report.	John Lyons	1.10	2,255.00
02/10/25	Prepare for and conduct weekly case management status and strategy call with J. King and J. Lyons.	Jeffrey S. Torosian	1.00	1,890.00
02/10/25	Update call regarding Zetta with trustee (.5); follow up with mediator (.3); review of case assignment issues and next steps (.7).	John Lyons	1.50	3,075.00
02/12/25	Review and analyze research	Jeffrey S. Torosian	1.00	1,890.00
02/12/25	Review research regarding	John Lyons	1.50	3,075.00
02/17/25	Weekly status update call.	John Lyons	1.00	2,050.00
02/17/25	Emails with J. King and J. Lyons regarding status and next steps on all matters.	Jeffrey S. Torosian	0.20	378.00
02/21/25	Review of professional fees calculations and impact on sensitivity analyses.	John Lyons	1.10	2,255.00
02/26/25	Continued review of (2.2); review of (1.3).	John Lyons	3.50	7,175.00
02/26/25	Review of professional fee calculations, write offs and impact on distribution metrics.	John Lyons	2.00	4,100.00

02/27/25	Emails with J. Coates regarding information needed to formulate plan of distributions (.20); emails with Omni regarding same (.10).	William L. Countryman	0.30	171.00
03/03/25	Correspond with J. Torosian, J. Lyons, B. Countryman, R. Sokol, and Trustee regarding	Joe Roselius	0.40	602.00
03/03/25	Review of .	John Lyons	1.10	2,255.00
03/03/25	Emails with team regarding	William L. Countryman	0.30	171.00
03/03/25	Weekly case management call with J. King and J. Lyons (0.5); numerous notices from Bankruptcy Court (1.0); emails with J. Lyons, G. Juell, R. Sokol, et al., regarding same and next steps (0.8).	Jeffrey S. Torosian	2.30	4,347.00
03/03/25	Review entered orders review re same (0.3).	Gregory M. Juell	0.50	720.00
03/11/25	Review of case	John Lyons	3.10	6,355.00
03/14/25	Review of (1.6); review of precedent regarding the same (.7).	John Lyons	2.30	4,715.00
03/24/25	Call with J. King regarding status and overall case management (0.3); confer with J. Lyons regarding same and next steps (0.3).	Jeffrey S. Torosian	0.60	1,134.00
03/27/25	Detailed review of	John Lyons	2.70	5,535.00

TOTAL TASK	182,013.50
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B112 Creditor Inquiries

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
12/04/24	Call with J. Lukas (Pachulski) regarding case update.	John Lyons	0.30	538.50
03/19/25	Update call with R. Urbanik.	John Lyons	0.40	820.00

B120 Asset Analysis and Recovery

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
01/10/25	Review of .	John Lyons	3.30	6,765.00
01/26/25	Review of	John Lyons	1.00	2,050.00

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02/10/25	Review of .	John Lyons	0.80	1,640.00
02/27/25	Review of .	John Lyons	0.80	1,640.00
02/28/25	Review of .	John Lyons	1.20	2,460.00

TOTAL TASK 14,555.0

B130 Asset Disposition

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
02/24/25	Receipt and review of and consider next steps on same (2.2).	Jeffrey S. Torosian	2.20	4,158.00

TOTAL TASK	4,158.00
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B155 Court hearings

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
12/18/24	Remote attendance at hearings.	William L. Countryman	0.80	412.00
12/18/24	Preparation for (.6) and participation in Zetta hearings (.9).	John Lyons	1.50	2,692.50

B160 Fee/Employment Applications

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/01/24	Emails with J. Lyons, N. Caton regarding same (.20); draft DLA Piper Twelfth Interim Fee Application, King Declaration (2.70); draft Seabury Fifth Interim Fee Application (1.00); emails with M. Cox regarding same (.10); email to professionals regarding next fee applications (.10).	William L. Countryman	3.90	2,008.50
10/02/24	Emails with N. Rapoport regarding timing of LEDES file submissions.	William L. Countryman	0.20	103.00
10/07/24	Review invoices, backup for Seabury Fifth Interim Fee Application (.50); emails with M. Mason regarding same (.10).	William L. Countryman	0.60	309.00
10/07/24	Review documentation for FTI Sixth Interim Fee Application (.30); emails with M. Gagyor regarding same (.10).	William L. Countryman	0.40	206.00
10/08/24	Review, analyze FTI Consulting invoices (.20); email to J. Lyons regarding fee application strategy (.20).	William L. Countryman	0.40	206.00
10/08/24	Complete review of Seabury invoices, LEDES files (.50); email LEDES files to N. Rapoport, Legal Decoder team (.10).	William L. Countryman	0.60	309.00

10/09/24	Emails to J. Lyons regarding various fee application issues (.20); review MGA invoice (.10); email same to N. Rapoport (.10); review O&B invoice (.20); emails with A. Mathivanan regarding same (.10).	William L. Countryman	0.70	360.50
10/10/24	Emails with J. Lyons regarding strategy on FTI fee application (.10); email FTI LEDES files to N. Rapoport (.20); emails with J. Tan regarding status of Quantuma invoice (.10); draft MGA Sixth Interim Fee Application (.40); draft Omni Twelfth Interim Fee Application (.60).	William L. Countryman	1.40	721.00
10/11/24	Draft 0&B Twelfth Interim Fee Application (1.20); revise Seabury Fifth Interim Fee Application (.50).	William L. Countryman	1.70	875.50
10/14/24	Review Omni invoices, LEDES files (.10); email LEDES files fee examiner team (.10); emails with S. Steinhorn regarding same (.10); review O&B invoice, LEDES file (.10); email LEDES file to fee examiner team (.10); emails with A. Mathivanan regarding same (.10); review Quantuma invoices, LEDES files (.10); email LEDES files to fee examiner team (.10); emails with J. Tan regarding same (.10).	William L. Countryman	0.90	463.50
10/15/24	Analyze invoices for twelfth interim period (2.5); revise twelfth interim fee app (2.1); call with W. Countryman re same (.3).	Rob Moskalewicz	4.90	5,145.00
10/15/24	Draft FTI Consulting Sixth Interim Fee Application (.80); email same to M. Gagyor for review and comment (.10); revise Seabury Fifth Interim Fee Application (.30); email to M. Mason regarding same (.10); Revise O&B Twelfth Interim Fee Application (.40); email same to A. Mathivanan (.10); revise Omni Agent Twelfth Interim Fee Application (.70); email same to S. Steinhorn for review, revision (.10); draft Quantuma Seventh Interim Fee Application (.90); email same to J. Tan, L. Furler for review, revision (.10); emails, call with R. Moskalewicz regarding DLA fee application (.30).	William L. Countryman	3.90	2,008.50
10/16/24	Input financial data into DLA Piper Twelfth Interim Fee Application.	William L. Countryman	2.80	1,442.00
10/16/24	Review proposed revisions to 0&B fee application (.20); emails with A. Mathivanan regarding same (.10); email DLA Piper LEDES files to fee examiner (.10); email to fee examiner regarding all LEDES files (.10).	William L. Countryman	0.50	257.50
10/21/24	Review, revise FTI Sixth Interim Fee Application (.30); emails with M. Gagyor regarding same (.10).	William L. Countryman	0.40	206.00
10/22/24	Emails with M. Noordin regarding WongPartnership outstanding invoices.	William L. Countryman	0.20	103.00
10/28/24	Review fee examiner reports to other professionals (.40); emails with S. Hazel regarding effect of ASARCO decision on FTI fee application (.20).	William L. Countryman	0.60	309.00
11/05/24	Review, revise FTI Sixth Interim Fee Application after reduction agreement with fee examiner.	William L. Countryman	0.30	154.50

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11/19/24	Create chart exhibits for King Declaration (2.40); emails with R. Sokol regarding information for same (.10); calculate exchange rate for O&B and revise application with same (.50).	William L. Countryman	3.00	1,545.00
11/21/24	Emails to Quantuma, Michael Goldman & Associates, Oon & Bazul, Omni, Seabury regarding approval of fee applications.	William L. Countryman	0.50	257.50
11/22/24	Review, upload fee application signatures from Trustee's professionals (.30); review revisions to Quantuma fee application and emails with J. Tan regarding same (.30); review revisions to Oon & Bazul fee application and emails with A. Mathivanan regarding same (.30); mark confidentiality redactions on all professionals' invoices (1.10); email same to J. Roselius for review (.10); emails with R. Sokol regarding information needed for J. King's Declaration (.20); compile, email fee applications to J. King for review (.30).	William L. Countryman	2.60	1,339.00
11/22/24	Revise redactions on invoices for fee applications.	Joe Roselius	1.00	1,305.00
11/22/24	Began review and revisions to fee application.	John Lyons	3.50	6,282.50
11/23/24	Apply and save confidentiality redactions to invoices and upload same (.30); emails with R. Sokol regarding information needed for King Declaration (.20).	William L. Countryman	0.50	257.50
11/23/24	Continued review and revisions to fee application.	John Lyons	2.30	4,128.50
11/24/24	Correspondence with J. Lyons regarding fee application.	Gregory M. Juell	0.40	486.00
11/25/24	Emails R. Sokol regarding additionally information for King Declaration in support of same (.20); run redline of fee application (.20); email same to J. Lyons for final review (.10); compile fee application, declaration with exhibits and email to J. King for review (.60); emails with J. King regarding revisions to same (.20); revise King Declaration with new comments (.30); email redline to J. Lyons, J. King for comment (.10); draft Proof of Service for fee applications (.50); draft Notice of Hearing, Proof of Service on fee applications (.90).	William L. Countryman	3.10	1,596.50

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11/26/24	Revise, prepare and electronically file DLA Twelfth Interim Fee Application (1.20); revise King Declaration (.20); emails with J. Lyons, J. King regarding same (.40); revise, prepare and electronically file FTI Consulting Sixth Interim Fee Application (.50); revise, prepare and electronically file Michael Goldberg Sixth Interim Fee Application (.40); revise, prepare and electronically file Omni Twelfth Interim Fee Application (.50); revise, prepare and electronically file Oon & Bazul Twelfth Interim Fee Application (.50); revise, prepare and electronically file Quantuma Seventh Interim Fee Application (.40); revise, prepare and electronically file Seabury Fifth Interim Fee Application (.50); revise, prepare and electronically file Proof of Service of same (.40); revise, prepare and electronically file Notice of Hearing of Interim Fee Applications (.40); email Applications, Notice to Omni for service (.10).	William L. Countryman	5.50	2,832.50
11/26/24	Review and final signoff on fee application.	John Lyons	1.50	2,692.50
12/02/24	Emails with N. Rapoport, J. Chi regarding Seabury LEDES files.	William L. Countryman	0.20	103.00
12/04/24	Revise, prepare and electronically file Notice of Errata on DLA Piper Twelfth Interim Fee Application (.50); revise fee application (.20); create redline (.20); emails, call with J. Lyons regarding same (.20); email same to Omni for service (.10); emails with M. Cox regarding fee application hearing (.20).	William L. Countryman	1.40	721.00
12/17/24	Review Tentative Rulings for fee hearing (.20); draft, email recap of same to attorneys (.40).	William L. Countryman	0.60	309.00
12/18/24	Draft Orders on nine (9) interim fee applications (.90); emails with S. Bovitz regarding same (.20); draft, prepare and electronically file Notice of Lodgment of orders (1.80); email same to Omni for service (.10); emails with N. Rapoport, J. Lyons, S. Bovitz regarding next round of fee applications (.20).	William L. Countryman	3.20	1,648.00
12/19/24	Emails with N. Rapoport, J. Lyons regarding hearing on next fee applications (.20); email to chambers regarding same (.10).	William L. Countryman	0.30	154.50
12/20/24	Review, download fee application orders (.40); input information from same into trustee system (.90); input information for 7 domestic wires (.70); complete forms for 2 international wires (.20); emails to J. King to approve wires (.50); call, emails with D. Coffman regarding fees (.20); emails with chambers, N. Rapoport regarding next fee hearing (.20).	William L. Countryman	3.10	1,596.50
03/11/25	Emails with A. Mathivanan regarding payment of Eleventh Interim Fee Application (.20); emails with J. Greene regarding upcoming billing (.10).	William L. Countryman	0.30	171.00

TOTAL TASK	42,613.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
12/04/24	Receipt and review of UL's and Jeff Nelson's respective objections to our fee application (0.5).	Jeffrey S. Torosian	0.50	820.00

B190 Other Contested Matters

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/11/24	Call with J. Lyons regarding appeal deadlines and extension of same.	William L. Countryman	0.20	103.00
11/04/24	Emails with A. Aguilar regarding issues with ECF notices in 9th circuit appeals.	William L. Countryman	0.30	154.50
11/05/24	Emails with J. Lyons regarding noticing in 9th Circuit appeals.	William L. Countryman	0.20	103.00
11/11/24	Review Mediation Orders in 9th Circuit cases and update calendar with dates from same.	William L. Countryman	0.40	206.00
01/29/25	Research pleadings filed by certain counsel (.30); emails, call with J. Lyons regarding same (.20).	William L. Countryman	0.50	285.00
02/03/25	Calls and emails with J. King regarding all matters and strategy and next steps on same (0.8); review research on and strategize with respect to same (2.0); call with J. King and J. Lyons regarding same and regarding all matters and strategy and next steps on same (1.0); review emails between J. Lyons and Mediator regarding status of settlement documentation and next steps (0.3).	Jeffrey S. Torosian	4.10	7,749.00
02/24/25	Analyze .	Joe Roselius	0.50	752.50

TOTAL TASK 9,353.0

B310 Claims Administration and Objections

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/01/24	Review of recent caselaw memo and application (1.1) and developed arguments (.4).	John Lyons	1.50	2,692.50
10/04/24	Continued review of (1.8), review of (1.5), (1).	John Lyons	3.20	5,744.00
10/09/24	Continued review and follow up on claims.	John Lyons	1.40	2,513.00
10/11/24	Call with J. Lyons regarding next steps regarding claims (.10); emails to claims team regarding call on same (.20).	William L. Countryman	0.30	154.50
10/14/24	Call with DLA team, R. Sokol, C. Yee, J. Tan regarding status, strategy of claims review, objections.	William L. Countryman	0.60	309.00

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10/14/24	Call with co-counsel regarding claims objections.	Gregory M. Juell	0.50	607.50
10/15/24	Emails with J. Tan, C. Lee regarding updates and review charts attached to same.	William L. Countryman	0.30	154.50
10/16/24	Continued review of claims resolutions and objections, priority objections and aircraft claims.	John Lyons	2.10	3,769.50
10/18/24	Revise draft objection to CAVIC's proofs of claim (1.7) and research regarding (2.1).	Gregory M. Juell	3.80	4,617.00
10/18/24	In depth review of administrative claims (1.3), (.7), (1.8) and recent precedent (1.9).	John Lyons	5.70	10,231.50
10/22/24	Continued review of administrative claims and follow up.	John Lyons	1.20	2,154.00
10/24/24	Review memorandum regarding (0.3); research regarding (1.1).	Gregory M. Juell	1.40	1,701.00
10/24/24	Revise spreadsheet of general unsecured claim based on recent reviews by Quantuma, Leech Tishman in preparation for call (.90); revise spreadsheet of priority unsecured claims in preparation for call (.50); emails regarding calls (.20).	William L. Countryman	1.60	824.00
10/24/24	Correspondence with D. Moshayedi regarding CAVIC claims memo (0.5); review same (0.8); review underlying cases (2.3).	Gregory M. Juell	3.60	4,374.00
10/25/24	Call with G. Juell, R. Sokol regarding general unsecured claims status, strategy (.80); call with S. Kelly (Omni) regarding claims spreadsheet needed (.20).	William L. Countryman	1.00	515.00
10/25/24	Call with W. Countryman and co-counsel regarding admin claims (0.8); review same (0.9); research regarding section 503(b)/administrative claims (2.5).	Gregory M. Juell	4.20	5,103.00
10/29/24	Review claims spreadsheet from Omni (.30); emails, call with Omni team regarding same (.30); emails with J. Lyons, R. Sokol regarding follow up call (.20).	William L. Countryman	0.80	412.00
10/29/24	Review of claims pool and follow up with Riccio claim (.8), Hong Kong High Yield and call with counsel (1.3), Charter One and call with counsel (1.4); review of Ow Chiat claim and follow up (.9); review of claims pool data and questions in preparation for meeting (1.3).	John Lyons	5.70	10,231.50
10/30/24	Review revised claims spreadsheet (.30); call with Omni team regarding same (.30); revise, email spreadsheet to J. Lyons, R. Sokol for call (.80); call with J. Lyons, R. Sokol, G. Juell regarding claims status, strategy (1.50); begin further revisions to claims spreadsheet based on requests on call (1.40); email to Seabury regarding their claims (.20).	William L. Countryman	4.50	2,317.50

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10/30/24	Review employee claims list (0.4); call with J. Lyons, W. Countryman, and R. Sokol re claims status and strategy (1.5); review claims-related correspondence (0.5).	Gregory M. Juell	2.40	2,916.00
10/30/24	Review of omni charts and claims (2.4); call with claims team and developed next steps (1.8).	John Lyons	4.20	7,539.00
10/31/24	Continued review of claims, New Target claims, expungement issues, and revisions to charts.	John Lyons	2.30	4,128.50
10/31/24	Review of revised claims data, calculations/distribution analysis, administrative versus pre-petition issues and other case closing issues.	John Lyons	2.70	4,846.50
10/31/24	Continue revisions to claims spreadsheet (1.70); emails with R. Sokol, G. Juell regarding information for same (.40).	William L. Countryman	2.10	1,081.50
10/31/24	Review CAVIC claims and related chart (0.8) and email W. Countryman re same (0.1); review New Target judgment (0.2) and internal emails re same (0.1); review and evaluate outstanding admin and priority claims (0.9); review employment claims (0.4).	Gregory M. Juell	2.50	3,037.50
11/01/24	Emails regarding New Target claim (.10); review chart of ECN/Element claims (.20); emails with G. Juell regarding same (.10); call with C. Oliver regarding same (.40); revise claims spreadsheet (1.60); email same to J. Lyons, R. Sokol, G. Juell (.10).	William L. Countryman	2.50	1,287.50
11/01/24	Review ECN/Element claims (0.9) and correspondence with J. Lyons and W. Countryman re same (0.2); review stipulation (0.4); review New Target judgment and claims (0.5).	Gregory M. Juell	2.00	2,430.00
11/01/24	Review of remaining ECN claim, orders and next steps (.9); review of claims pool metrics and calculations of distributions and priority strategy (2.3); review of chapter 11 professional claims, estate analysis and possible objection (1.1); review of CAVIC proofs of claim, postpetition interest and adequate protection issues (1.9).	John Lyons	6.10	10,949.50
11/04/24	Review of D. Riccio claim, calculations and objection (2.1); review of updated charts and questions (1.9); call with B. Countryman regarding open claims issues (.5).	John Lyons	4.50	8,077.50
11/05/24	Review of Rainbow issues and record (.9); review of additional aircraft objections and 365(d)(1) objection strategies and recent caselaw (2.1); review of LA county claim and issues (.8).	John Lyons	3.80	6,821.00
11/06/24	Continued review of updated claims detail including aircraft claims (1.1), other chapter 11 priority claims (.9), professional claims, holdbacks and reserves and sensitivity analyses (2.1), CAVC claims and objection strategies (1.3), Universal Leader/Glove Asset claim and calculations (1.4) and call with B. Countryman (1.1).	John Lyons	7.90	14,180.50

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11/07/24	Call with J. Lyons regarding claims spreadsheet (.30); revise spreadsheet per J. Lyons' comments (.70); email same to J. Lyons (.10).	William L. Countryman	1.10	566.50
11/07/24	Review of Bombardier claims, calculations and possible objections.	John Lyons	1.10	1,974.50
11/09/24	Follow response to fee examiner regarding claims.	John Lyons	0.10	179.50
11/11/24	Revise, compile charts of outstanding claims (1.30); email same to J. Lyons (.10).	William L. Countryman	1.40	721.00
11/11/24	Revised and updated claims chart (.8). transmittal to Arnold and Porter (.3).	John Lyons	1.10	1,974.50
11/12/24	Claims pool call with Arnold and Porter.	John Lyons	1.00	1,795.00
11/14/24	Review, revise outstanding claims spreadsheets (.80); emails with J. Lyons, R. Sokol regarding same (.30); retrieve, email Ample claims to J. Lyons (.40); emails with J. Lyons, R. Sokol regarding status of same (.20).	William L. Countryman	1.70	875.50
11/16/24	Research, review Final DIP Order regarding claims for Seagram, Walter (.20); emails with J. Lyons regarding same (.10); email Ample claims to M. Mason for review (.10).	William L. Countryman	0.40	206.00
11/18/24	Calls with J. Lyons and W. Countryman re claims status and strategy (1.2); review Ample claim documents (0.9).	Gregory M. Juell	2.10	2,551.50
11/18/24	Prepare for and calls with J. Lyons, G. Juell regarding administrative claims strategies.	William L. Countryman	1.80	927.00
11/18/24	In depth review of Ample proof of claim, background documents and stipulation and formulated objections.	John Lyons	3.90	7,000.50
11/18/24	Review of LA County claim (.6); review of other tax claims (.7); follow up regarding Ample with Seabury and review of lease rates and block hour issues (1.3).	John Lyons	2.60	4,667.00
11/19/24	Review supporting documents for Chapter 11 General Administrative Claims (USA) to determine if claims have proper supporting documentation (3.6); emails with B. Countryman regarding same (.1).	Clara G. Oliver	3.70	1,572.50
11/19/24	Emails with R. Sokol regarding claim 2-5 (.20); emails with C. Oliver regarding review of general admin claims (.40); review bank statements for payments to CAVIC, Walter (1.30); emails to G. Juell, J. Lyons regarding same (.20).	William L. Countryman	2.10	1,081.50
11/19/24	Review of Seagrim DIP order and emails with Seagrim regarding back up documentation (1.5); review of Weia Hunt claim (.8).	John Lyons	2.30	4,128.50
11/20/24	Review of Seagrim backup for claim and orders.	John Lyons	1.40	2,513.00
11/20/24	Review supporting documents for Chapter 11 General Administrative Claims (PTE) to determine if claims have proper supporting documentation.	Clara G. Oliver	3.10	1,317.50

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0.80	412.00
3.70	1,905.50
3.90	4,738.50
3.40	6,103.00
2.40	1,020.00
4.30	2,214.50
2.50	4,487.50
0.30	154.50
4.50	8,077.50
1.40	1,701.00
0.20	103.00
0.80	972.00
2.10	2,551.50
1.70	2,065.50
	3.90 3.40 2.40 4.30 2.50 0.30 4.50 1.40 0.20 0.80 2.10

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12/09/24	Correspondence with D. Moshayedi regarding Riccio stipulation and next steps (0.3); review and revise stipulation (0.5); review underlying claim (0.2) and background (0.3).	Gregory M. Juell	1.30	1,579.50
12/10/24	Revise Stipulation regarding Riccio claim (.40); emails with G. Juell, D. Moshayedi regarding same (.20).	William L. Countryman	0.60	309.00
12/10/24	Revise draft Riccio stipulation (0.4) and email J. Lyons re same and correspondence with D. Moshayedi re same (0.2).	Gregory M. Juell	0.60	729.00
12/11/24	Review of chapter 11 administrative claims (non-aircraft) and charted objection strategies.	John Lyons	3.20	5,744.00
12/13/24	Research regarding good faith defense.	Gregory M. Juell	0.30	364.50
12/16/24	Updates regarding (1.1), (.7) and (2.4).	John Lyons	4.20	7,539.00
12/18/24	Review of Ample issues and calculations (2.1) and review of CAVIC objection strategies (1.7).	John Lyons	3.80	6,821.00
12/19/24	Review of claims and objections, next steps and distribution metrics.	John Lyons	1.30	2,333.50
12/20/24	Correspondence with J. Lyons regarding Ample claim objection (0,5); draft outline (0.7).	Gregory M. Juell	1.20	1,458.00
12/20/24	Review of Ample documents, stipulations and strategies regarding objections.	John Lyons	1.80	3,231.00
12/22/24	Draft Ample outline (0.6) and correspondence with D. Moshayedi regarding same (0.3).	Gregory M. Juell	0.90	1,093.50
12/23/24	Research regarding Ample claims (.20); emails with C. Oliver regarding same (.10).	William L. Countryman	0.30	154.50
12/24/24	Draft objection to Ample's POC (2.1) and review underlying POCs (0.8) and pleadings (0.9).	Gregory M. Juell	3.80	4,617.00
12/27/24	Review updated charts, status of claims and objections, and claims and distribution calculations.	John Lyons	4.50	8,077.50
12/31/24	Draft Ample claim objection.	Gregory M. Juell	5.10	6,196.50
01/03/25	Emails regarding call to discuss status of claim objections.	William L. Countryman	0.20	114.00
01/03/25	Draft Ample claim objection.	Gregory M. Juell	0.90	1,296.00
01/07/25	Call with claims team regarding status, strategy of review and objections.	William L. Countryman	0.60	342.00
01/07/25	Prepare for (0.5) and participate in call with cocounsel and DLA team regarding status of claim objections (0.8); revise draft objection to Ample's claim (1.8); correspondence with J. Lyons regarding Riccio claim (0.2).	Gregory M. Juell	3.30	4,752.00
01/07/25	Preparation for (.9) and participation in all hands claims strategy call (2.0); follow up tasks regarding documentation review and CAVIC and Ample objections (1.8).	John Lyons	4.70	9,635.00
01/08/25	Revise claims chart with notes from call (.20); review Chelsea Jet claim (.20); email to claim team regarding same (.20).	William L. Countryman	0.60	342.00
01/08/25	Revise draft Ample claim objection.	Gregory M. Juell	2.20	3,168.00

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01/08/25	Review UL claims and (1.1); communications with D. Riccio regarding claim and analysis (1.3); review of CAVIC claims including (2.2); review of Bombardier / Jetcraft and affiliate claims and (.9).	John Lyons	5.50	11,275.00
01/09/25	Draft objection Ample claim.	Gregory M. Juell	1.10	1,584.00
01/10/25	Review order on omnibus claim objection and revise chart for same.	William L. Countryman	0.20	114.00
01/10/25	Revise draft objection to Ample's POC.	Gregory M. Juell	2.70	3,888.00
01/14/25	Revise objection to Ample's POC.	Gregory M. Juell	2.40	3,456.00
01/14/25	Update with J. Tan (.7) and review of Cassidy and New Target enforcement issues (1.2).	John Lyons	1.90	3,895.00
01/15/25	Revise draft Ample claim objection (4.4) and call with J. Lyons re same (0.4).	Gregory M. Juell	4.80	6,912.00
01/16/25	Finish draft objection to Ample POC.	Gregory M. Juell	4.80	6,912.00
01/16/25	Review of Ample objection (1) and review of pending administrative claims and strategies to liquidate (2.2).	John Lyons	3.20	6,560.00
01/20/25	Review and follow up regarding claims data to object to Festin (.3), follow up regarding timeline and strategy to liquidate remaining claims (.6); recoveries update (.4).	John Lyons	1.30	2,665.00
01/23/25	Emails with C. Yee regarding certain claims.	William L. Countryman	0.20	114.00
01/27/25	Correspondence with J. Lyons re claim objections/status (0.2); correspondence with D. Moshayedi CAVIC claim objection/updates (0.4); research regarding (1.2); revise draft claim objection (0.7).	Gregory M. Juell	2.40	3,456.00
01/28/25	Correspondence with D. Moshayedi regarding CAVIC research (0.5); revised draft objection to CAVIC's POC (0.9); review underlying POCs (0.3).	Gregory M. Juell	1.70	2,448.00
01/29/25	Revise draft objection to CAVIC's POC (2.1) and correspondence with D. Moshayedi re same (0.2).	Gregory M. Juell	2.30	3,312.00
01/31/25	Correspondence with J, Lyons regarding Festin claim objection (0.3); review relevant adversary complaint (0.5); correspondence with DLA team regarding document productions (0.4); review relevant document productions (3.8) and correspondence with D. Moshayedi re same (0.3).	Gregory M. Juell	5.30	7,632.00
01/31/25	Factual investigation regarding \$1 million payment to Festin.	John Lyons	2.50	5,125.00
02/01/25	Review of Festin payments and analysis.	John Lyons	2.70	5,535.00
02/02/25	Review of claims status and developed strategies.	John Lyons	1.50	3,075.00
02/03/25	Revise, email claims spreadsheet to claims team (.30); email to B. Osborne regarding spreadsheet of allowed claims needed (.10); emails regarding call for next steps (.10).	William L. Countryman	0.50	285.00

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02/03/25	Review documents relevant to the Festin claim objection (1.3); email J. Lyons re same (0.2); revise draft objection to CAVIC's administrative claim (1.7); research section 503(b) (0.9); review claims status chart (0.2).	Gregory M. Juell	4.30	6,192.00
02/03/25	Additional review of Festin information and objection grounds.	John Lyons	2.10	4,305.00
02/04/25	Review updates to claims spreadsheet from C. Lee (.30); calendar call to discuss same (.10).	William L. Countryman	0.40	228.00
02/04/25	Revise draft CAVIC objection (1.8); review ECN claim (0.4).	Gregory M. Juell	2.20	3,168.00
02/04/25	Detailed review of claims update (1.1); review of Bombardier claims and impact on distribution analysis (.8); review of CAVIC claims, mitigation and impact on distribution analysis (1.8).	John Lyons	3.80	7,790.00
02/05/25	Review new claims spreadsheet from Omni (.20); call with Omni regarding same, strategy (.80); call with claims team regarding updates, strategies for claim objections (1.80); update spreadsheets (.30).	William L. Countryman	3.10	1,767.00
02/05/25	Call with DLA and co-counsel regarding claims status and objections (2.1); follow-up correspondence regarding Festin claim objection (0.3) and review Relativity documents re same (0.9).	Gregory M. Juell	3.30	4,752.00
02/05/25	Preparation for (1.1) and participation in claims call (1.3); follow up regarding Festin (.9).	John Lyons	3.30	6,765.00
02/05/25	Follow up regarding claims mitigation with CAVIC (.4) and review of claims (1.2).	John Lyons	1.60	3,280.00
02/06/25	Review supporting documentation for Festin claim (0.8) and revise draft CAVIC objection (0.6).	Gregory M. Juell	1.40	2,016.00
02/07/25	Review of chapter 7 plans of liquidation and assignment of claim/distributions rights posteffective date.	John Lyons	3.50	7,175.00
02/07/25	Review additional documentation regarding Festin management claims and correspondence with DLA team regarding same.	Gregory M. Juell	0.90	1,296.00
02/07/25	Emails with J. Lizakowski regarding claims update.	William L. Countryman	0.20	114.00
02/10/25	Correspondence with co-counsel regarding Festin objection (0.3); review related diligence documents regarding potential payments (3.4).	Gregory M. Juell	3.70	5,328.00
02/10/25	Further factual investigation regarding SN 1360/1372 and grounds for objection.	John Lyons	1.20	2,460.00
02/11/25	Call with Omni team regarding updated claims register.	William L. Countryman	0.80	456.00
02/11/25	Correspondence with D. Moshayedi regarding status and strategy (0.5); review claims status (0.4).	Gregory M. Juell	0.90	1,296.00
02/12/25	Correspondence with D. Moshayedi re status and next steps.	Gregory M. Juell	0.20	288.00

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02/13/25	Review of claims pool issues and sensitivity calculations to stakeholders under various assumptions (2.1); review of Ample objection and comments (.8); review of unliquidated claims and assumptions (.8).	John Lyons	3.70	7,585.00
02/14/25	Review of unsecured priority claims, strategies regarding objection and sensitivity assumptions regarding distribution (1.1); review of CAVIC, Bombardier and UL claims, sensitivity analyses regarding distribution and assumption and analysis (1.9).	John Lyons	3.00	6,150.00
02/17/25	Emails to R. Labate regarding mitigation information (.3); continued review of chapter 11 claims and sensitivity analyses including professional fee claims, aircraft claims and block hour claims (2.2); review of SN/Festin issues (.5).	John Lyons	3.00	6,150.00
02/18/25	Review of additional emails regarding SN LLCs (.9) and CAVIC (.5).	John Lyons	1.40	2,870.00
02/20/25	Call with J. Lyons regarding claim objections status and next steps.	Gregory M. Juell	0.20	288.00
02/20/25	In depth review of CAVIC claim issues including FAA strategy, mitigation strategy and proofs of claims.	John Lyons	3.20	6,560.00
02/21/25	Correspondence with J. Lyons (0.3) and cocounsel (0.2) regarding; review underlying documentation re same (1.7); correspondence with DLA team regarding CAVIC claim/and analysis (0.3); follow-up correspondence with DLA team regarding same (0.3).	Gregory M. Juell	2.80	4,032.00
02/21/25	Review and analysis of Zetta emails and email to R. Sokol regarding objection to SN LLC claims.	John Lyons	2.10	4,305.00
02/23/25	Correspondence with co-counsel regarding and review related documents.	Gregory M. Juell	0.50	720.00
02/25/25	Review Tentative Ruling on claim objection (.10); emails with J. Lyons regarding same (.10).	William L. Countryman	0.20	114.00
02/25/25	Call with J. Lyons and W. Countryman re claims status and next steps.	Gregory M. Juell	0.50	720.00
02/26/25	Revise draft objection to CAVIC's proof of claim per correspondence with J. Lyons.	Gregory M. Juell	1.60	2,304.00
02/27/25	Revise draft CAVIC claim objection per correspondence with J. Lyons.	Gregory M. Juell	1.30	1,872.00
02/28/25	Review of (1.8); review of updates (.5).	John Lyons	2.30	4,715.00
02/28/25	Revise draft CAVIC claim objection per comment from J. Lyons (2.4); review additional proofs of claim (1.8).	Gregory M. Juell	4.20	6,048.00

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03/02/25	Research (1.60); and update CAVIC claim objection regarding same (.80).	Desiree Moshayedi	2.40	2,148.00
03/03/25	Correspondence with D. Moshayedi re claims status and objections (0.5); review objection to CAVIC claims (3.8).	Gregory M. Juell	4.30	6,192.00
03/03/25	Continue research (1.30); revise CAVIC claim objection regarding same (.60); Call with G. Juell re. same (.50).	Desiree Moshayedi	2.40	2,148.00
03/04/25	Continue research (1.40); revise CAVIC claim objection regarding same (.70).	Desiree Moshayedi	2.10	1,879.50
03/04/25	Revise draft objection to CAVIC claims (3.2); review underlying 8 POCs (0.8); research (0.9).	Gregory M. Juell	4.90	7,056.00
03/05/25	Revise Objection to CAVIC Claims (1.20); emails with G. Juell regarding same (.10); call with Omni team regarding chart of claims (.80).	William L. Countryman	2.10	1,197.00
03/05/25	Revise draft objection to CAVIC claim.	Gregory M. Juell	2.80	4,032.00
03/06/25	Review ECN settlement and related claims.	Gregory M. Juell	0.90	1,296.00
03/07/25	Review, revise chart of CAVIC claims (.40); emails with G. Juell regarding same (.10).	William L. Countryman	0.50	285.00
03/07/25	Revise draft CAVIC objection (1.6); draft ECN objection (2.6).	Gregory M. Juell	4.20	6,048.00
03/10/25	Review ECN claims (0.9) and draft motion to disallow same (4.9).	Gregory M. Juell	5.80	8,352.00
03/10/25	Review of claims status, strategies, next steps and calculations.	John Lyons	5.50	11,275.00
03/12/25	Emails with S. Kelly regarding call regarding call to review claims register.	William L. Countryman	0.20	114.00
03/12/25	Continued review of claims objections (aircraft) and priority claims.	John Lyons	3.20	6,560.00
03/13/25	Draft objection to ECN claims (1.9) and review related settlement agreement (0.3).	Gregory M. Juell	2.20	3,168.00
03/14/25	Draft objection to ECN POCs.	Gregory M. Juell	5.80	8,352.00
03/14/25	Call with omni regarding claims pool and data (.7) and follow up (1.1).	John Lyons	1.80	3,690.00
03/17/25	Call with Omni team regarding claims spreadsheet.	William L. Countryman	0.70	399.00
03/17/25	Research regarding (0.7) and revise draft CAVIC objection re same (0.7).	Gregory M. Juell	1.40	2,016.00
03/18/25	Review, revise claims' spreadsheet from Omni (.50); call with J. Lyons regarding same (.10); emails with claims team regarding same, call (.10).	William L. Countryman	0.70	399.00
03/18/25	Review CAVIC bankruptcy court (0.5) and district court rulings (0.7); revise claim objection re same (0.6).	Gregory M. Juell	1.80	2,592.00
03/18/25	Review of charts, objections and other materials for claims call.	John Lyons	3.10	6,355.00
03/19/25	Call with J. Lyons, G. Juell, R. Sokol, C. Yee regarding claim objection strategy.	William L. Countryman	1.80	1,026.00

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03/19/25	Call re claims status (1.9); revise draft CAVIC objection re same (0.8).	Gregory M. Juell	2.70	3,888.00
03/19/25	Claims call (2.0) and follow up tasks (2.5).	John Lyons	4.50	9,225.00
03/20/25	Email to M. Goldman regarding IRS claim and possible objection.	William L. Countryman	0.20	114.00
03/20/25	Brief research (0.6) and revise brief re same (0.3).	Gregory M. Juell	0.90	1,296.00
03/20/25	Review of IRS claim and formulated objection strategy.	John Lyons	1.30	2,665.00
03/21/25	Revise draft objection to CAVIC claim.	Gregory M. Juell	1.30	1,872.00
03/30/25	Correspondence with J, Lyons re claim objection status (0.2) and research regarding (0.5).	Gregory M. Juell	0.60	864.00
03/31/25	Correspondence with J. Lyons regarding CAVIC objection and related revisions (0.2); research regarding (1.1); review bankruptcy court opinion and district court opinion (1,4); revise draft objection (2.8).	Gregory M. Juell	5.50	7,920.00

TOTAL TASK	571,949.50
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TOTAL HOURS	560.20

TOTAL FEES 829,925.

Timekeeper Summary

The following legal services were provided by DLA Piper LLP (US):

TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
John Lyons	Partner	129.30	2,050.00	265,065.00
Jeffrey S. Torosian	Partner	17.20	1,890.00	32,508.00
John Lyons	Partner	136.60	1,795.00	245,197.00
Jeffrey S. Torosian	Partner	0.50	1,640.00	820.00
Joe Roselius	Partner	1.00	1,505.00	1,505.00
Gregory M. Juell	Associate	107.50	1,440.00	154,800.00
Joe Roselius	Partner	1.00	1,305.00	1,305.00
Gregory M. Juell	Associate	53.50	1,215.00	65,002.50
Rob Moskalewicz	Associate	4.90	1,050.00	5,145.00
Desiree Moshayedi	Associate	6.90	895.00	6,175.50
William L. Countryman	Paralegal	14.60	570.00	8,322.00
William L. Countryman	Paralegal	78.00	515.00	40,170.00
Clara G. Oliver	Paralegal	9.20	425.00	3,910.00
	FEES	560.20		829,925.00

Task Summary

TASK	DESCRIPTION	HOURS	AMOUNT
B110	Case Administration	97.60	182,013.50
B112	Creditor Inquiries	0.70	1,358.50
B120	Asset Analysis and Recovery	7.10	14,555.00
B130	Asset Disposition	2.20	4,158.00
B155	Court hearings	2.30	3,104.50
B160	Fee/Employment Applications	57.40	42,613.00
B170	Fee/Employment Objections	0.50	820.00
B190	Other Contested Matters	6.20	9,353.00
B310	Claims Administration and Objections	386.20	571,949.50
	TOTALS	560.20	829,925.00

Activity Summary

CODE	DESCRIPTION	HOURS	AMOUNT
B03001	Budget Motion	7.70	9,215.50
B03003	Fee Applications (non-fee examiner)	57.90	43,433.00
B03007	Cassidy Judgment Enforcement (Use with Task Code B190 only)	9.80	19,465.50
B03008	General Coordination/Planning/Strategy/Analysis	15.50	29,587.00
B03009	General Case Administration	463.60	719,623.50
B03010	Other Contested Matters	5.70	8,600.50
	TOTALS	560.20	829,925.00

Disbursements

DATE	DESCRIPTION	AMOUNT
10/16/24	Vendor: WILLIAM COUNTRYMAN Invoice#: 010069916746 Date: 10/18/2024 10/16/2024 - QuickBooks subscription for October 2024	54.00
11/16/24	Vendor: WILLIAM COUNTRYMAN Invoice#: 010070612738 Date: 11/19/2024 11/16/2024 - QuickBooks subscription for November 2024	56.68
12/16/24	Vendor: WILLIAM COUNTRYMAN Invoice#: 010071242006 Date: 12/17/2024 12/16/2024 - QuickBooks subscription for December 2024	56.68
01/06/25	Vendor: PACER SERVICE CENTER Invoice#: 4429046-Q42024 Date: 1/6/2025 Pacer Qtr4th- Usage10/01/2024- 12/31/2024	6.00
01/16/25	Vendor: WILLIAM COUNTRYMAN Invoice#: 010071766352 Date: 1/21/2025 01/16/2025 - QuickBooks subscription for January 2025	56.68
02/16/25	Vendor: WILLIAM COUNTRYMAN Invoice#: 010072446992 Date: 2/24/2025 02/16/2025 - QuickBooks Subscription for February 2025	56.68
02/21/25	Vendor: WELLS FARGO BANK Invoice#: 010072576175 Date: 3/12/2025 - Chris Galvanauskas - 02/21/2025 - FAA Aircraft Record Request (N96AP; N788ZJ; N988ZJ) - PC	60.00

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DATE	DESCRIPTION	AMOUNT
03/16/25	Vendor: WILLIAM COUNTRYMAN Invoice#: 010072987727 Date: 3/24/2025 03/16/2025 - QuickBooks subscription for March 2025	54.50
	Data Hosting Charges by Relativity	39,960.00
	TOTAL DISBURSEMENTS	40,361.22

TOTAL THIS INVOICE	USD 870,286.22
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New Target Invoices



DLA Piper (US) J. Lyons T 312-368-4000

PRIVILEGED AND CONFIDENTIAL

Jonathan King, Chapter 7 Trustee DLA Piper, LLC 444 West Lake Street Suite 900 Chicago, IL 60606 INVOICE # 883383316
Invoice Date June 13, 2025

Client Name Jonathan King, Chapter 7 Trustee

Matter Name Jonathan King, Chapter 7 Trustee - New Target Adversary

Matter Number 411031.003002

For Professional Services through March 31, 2025

 Fees
 158,302.50

 Disbursements
 0.00

 TOTAL THIS INVOICE
 USD 158,302.50

Please remit payment by July 13, 2025

Please send remittance instructions to accounts@us.dlapiper.com

Pay Online Pay online	Click the "Pay online" button or visit https://paymentportal.dlapiper.com to make a payment online using your bank account or credit card	The invoice number 883383316 and invoice amount 158302.50 is required for access to the payment center.
Payment via Wire/ACH	Wells Fargo Bank, N.A. 1700 K Street, NW, 9th Floor Washington, DC 20006 Account Name: DLA Piper LLP (US)	To ensure proper credit, please indicate the invoice number(s) on the wire or ACH
	Account No.: 4053611935 ABA Transit No.: 121000248 Swift Code: WFBIUS6S	Law Firm Tax Identification No.: 52-0616490
Payment via Check to Lockbox	DLA Piper LLP (US) P.O. Box 780528 Philadelphia, PA 19178-0528	Please do not send checks to firm office address.

FEE DETAIL

The following legal services were provided by DLA Piper LLP (US):

B130 Asset Disposition

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/14/24	Review of Dragon Pearl updates, New Target claims issues and next steps.	John Lyons	1.10	1,974.50
10/15/24	Call with DLA Australia regarding next steps (1); review of marketing materials and Maritimo position (.7); review of motion (.9).	John Lyons	2.60	4,667.00
10/25/24	Review of cash budget/DP disposition costs motion.	John Lyons	2.50	4,487.50
10/28/24	Review of updated information and motion (2.3); call with UL counsel and next steps (2.1).	John Lyons	4.00	7,180.00
10/29/24	Correspondence with J. Lyons regarding motion to pay DP disposition costs (0.3); draft same (0.5).	Gregory M. Juell	0.80	972.00
10/30/24	Revise draft Dragon Pearl expenditures motion.	Gregory M. Juell	0.50	607.50
10/31/24	Draft DP costs motion and related declaration.	Gregory M. Juell	2.80	3,402.00
11/05/24	Revise draft DP costs motion.	Gregory M. Juell	0.70	850.50
11/06/24	Draft Caton and King declarations in support of DP costs motion (1.9); review broker materials (1.4) and related correspondence (0.6); revise draft motion (0.8).	Gregory M. Juell	4.70	5,710.50
11/07/24	Call with J. Lyons regarding Dragon Pearl costs motion (0.4)' follow up call regarding same (0.3); revise draft motion (2.4) and declarations (1.3).	Gregory M. Juell	4.40	5,346.00
11/08/24	Review of (1.1); review of (.8); developed recovery analysis (1.4).	John Lyons	3.30	5,923.50
11/12/24	Revise draft DP costs motion and declaration per comments from J. Lyons (4.5); research regarding (0.9).	Gregory M. Juell	5.40	6,561.00
11/12/24	Revisions to Dragon Pearl enforcement motion.	John Lyons	3.50	6,282.50
11/13/24	In depth review of materials regarding (2.1) and email to A. Lawson regarding assistance (.2).	John Lyons	2.30	4,128.50
11/14/24	Revise draft DP costs motion and prepare exhibit.	Gregory M. Juell	0.60	729.00
11/22/24	Detailed review of , review of pleadings in preparation for call.	John Lyons	2.80	5,026.00
11/25/24	Call with A&M regarding .	John Lyons	1.00	1,795.00

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11/27/24	Review .	John Lyons	2.00	3,590.00
11/29/24	Review of (3.5) and call with A&M (.5).	John Lyons	4.00	7,180.00
12/01/24	Revise and finalize DP costs motion and accompanying declarations and order (1.2); email J. Lyons re same (0.1).	Gregory M. Juell	1.30	1,579.50
12/02/24	Revise chart of Dragon Pearl costs (.40); communications with G. Juell regarding same (.20).	William L. Countryman	0.60	309.00
12/03/24	Revise Dragon Pearl costs breakdown chart (.30); emails with G. Juell regarding same (.10).	William L. Countryman	0.40	206.00
12/03/24	Detailed review of .	John Lyons	3.50	6,282.50
12/04/24	Revise DP costs motion per updated cost estimates (0.5); correspondence with W. Countryman re same (0.2).	Gregory M. Juell	0.70	850.50
12/04/24	Continued review of	John Lyons	2.00	3,590.00
12/04/24	Revise/update DP costs motion (0.9); correspondence with J. Lyons regarding same (0.2).	Gregory M. Juell	1.10	1,336.50
12/09/24	Correspondence with DLA Australia regarding revisions to DP costs motion (0.3); review revised draft declaration and motion (0.5).	Gregory M. Juell	0.80	972.00
12/10/24	Call with N. Burkill (.5) and follow up review of documents regarding (3).	John Lyons	3.50	6,282.50
12/10/24	Correspondence with DLA Australia re DP motion revisions (0.2); review same (0.3).	Gregory M. Juell	0.50	607.50
12/11/24	Revise and finalize Dragon Pearl motion and related declarations per comments from A&P and DLA Australia (1.2); correspondence with J, Lyons and W. Countryman re same (0.3); review revised exhibits (0.2).	Gregory M. Juell	1.70	2,065.50
12/11/24	Revise Dragon Pearl Cost Motion (.40); email same to J. King for review, signature (.10).	William L. Countryman	0.50	257.50
12/12/24	Detailed review of	John Lyons	4.00	7,180.00
12/17/24	Review of status in Australia (.5), timing issues and closing of sale (.3) and preparation for hearing (.3), review of undertakings and funds for distribution (.7).	John Lyons	1.80	3,231.00
12/18/24	Revise, prepare and electronically file Dragon Pearl Costs Motion (.80); Draft, prepare and electronically file Notice of same (.50); emails with J. Lyons, G. Juell regarding same (.20); email same to Omni for service (.10).	William L. Countryman	1.60	824.00
12/21/24	Review of Dragon Pearl updates, return of undertakings and other collection opportunities.	John Lyons	2.10	3,769.50
01/16/25	Retrieve, email to J. Lyons.	William L. Countryman	0.30	171.00
01/16/25	Call with N. Burkill (.50); review of (2.30).	John Lyons	2.80	5,740.00

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01/20/25	Review of and Ogier engagement terms. with trustee	John Lyons	0.80	1,640.00
01/22/25	Draft, prepare and electronically file Notice of Lodgment of Order on Dragon Pearl Cost Motion, Proof of Service (.90); revise, lodge Order (.40); emails with G. Juell, J. Lyons regarding same (.20); email same to Omni for service (.10).	William L. Countryman	1.60	912.00
01/22/25	Review DP costs notice and order and correspondence with W. Countryman re same.	Gregory M. Juell	0.40	576.00
01/22/25	Coordination with Ogier and review of options with trustee.	John Lyons	0.40	820.00
01/27/25	Revise and upload Order on Dragon Pearl Cost Motion per chambers notification.	William L. Countryman	0.30	171.00
01/28/25	Review of options in preparation for call (.4), call with Ogier and next steps (.8).	John Lyons	1.20	2,460.00
01/29/25	Review of Ogier factors and analysis (.5); began gathering relevant documents (3.0).	John Lyons	3.50	7,175.00
01/30/25	Detailed review of affidavit of N. Burkill, first amended complaint and other factual background documents.	John Lyons	3.50	7,175.00
01/31/25	Review of (1.3) and factual investigation regarding (1.9).	John Lyons	3.20	6,560.00
02/01/25	Research, email to J. Lyons.	William L. Countryman	1.30	741.00
02/01/25	In depth review of	John Lyons	2.30	4,715.00
02/09/25	Review of developments in	John Lyons	0.70	1,435.00
02/17/25	Review of federal court submission and status.	John Lyons	1.10	2,255.00

TOTAL TASK	158,302.50
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TOTAL HOURS	98.50
TOTAL FEES	158,302.50

Timekeeper Summary

The following legal services were provided by DLA Piper LLP (US):

TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
John Lyons	Partner	19.50	2,050.00	39,975.00
John Lyons	Partner	46.00	1,795.00	82,570.00

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TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
Gregory M. Juell	Associate	0.40	1,440.00	576.00
Gregory M. Juell	Associate	26.00	1,215.00	31,590.00
William L. Countryman	Paralegal	3.50	570.00	1,995.00
William L. Countryman	Paralegal	3.10	515.00	1,596.50
	FEES	98.50		158,302.50

Task Summary

TASK	DESCRIPTION	HOURS	AMOUNT
B130	Asset Disposition	98.50	158,302.50
	TOTALS	98.50	158,302.50

Activity Summary

CODE	DESCRIPTION	HOURS	AMOUNT
B32001	Enforcement/Collection of Judgment in Australia	43.40	62,662.00
B32003	Enforcement/Collection of Judgment in British Virgin Islands	46.10	87,263.00
B32004	General Coordination/Planning/Strategy/Analysis	9.00	8,377.50
	TOTALS	98.50	158,302.50

TOTAL THIS INVOICE	USD 158,302.50
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Jetcraft Invoices



DLA Piper (US) J. Lyons T 312-368-4000

PRIVILEGED AND CONFIDENTIAL

Jonathan King, Chapter 7 Trustee DLA Piper, LLC 444 West Lake Street Suite 900 Chicago, IL 60606

Client Name Jonathan King, Chapter 7 Trustee

Matter Name King V. Jetcraft **Matter Number** 411031.003003

INVOICE # 883383317
Invoice Date June 17, 2025

For Professional Services through March 31, 2025

 Fees
 577,158.00

 Disbursements
 8,260.66

 TOTAL THIS INVOICE
 USD 585,418.66

Please remit payment by July 17, 2025

Please send remittance instructions to accounts@us.dlapiper.com

Please so	Please send remittance instructions to <u>accounts@us.ulapiper.com</u>				
Pay Online Pay online	Click the "Pay online" button or visit https://paymentportal.dlapiper.com to make a payment online using your bank account or credit card	The invoice number 883383317 and invoice amount 585418.66 is required for access to the payment center.			
Payment via Wire/ACH	Wells Fargo Bank, N.A. 1700 K Street, NW, 9th Floor Washington, DC 20006 Account Name: DLA Piper LLP (US)	To ensure proper credit, please indicate the invoice number(s) on the wire or ACH			
	Account No.: 4053611935 ABA Transit No.: 121000248 Swift Code: WFBIUS6S	Law Firm Tax Identification No.: 52-0616490			
Payment via Check to Lockbox	DLA Piper LLP (US) P.O. Box 780528 Philadelphia, PA 19178-0528	Please do not send checks to firm office address.			

FEE DETAIL

The following legal services were provided by DLA Piper LLP (US):

B190 Other Contested Matters (excluding assumption/rejection motions)

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/01/24	Review of settlement demand and assessed counterproposal and sensitivity analysis (1.2); call with trustee (.9); formulated next steps (1.4).	John Lyons	3.50	6,282.50
10/02/24	Preparation for (.7) and call with A. Troop (.4); call with trustee (.4); review of settlement strategies (1.1).	John Lyons	2.60	4,667.00
10/04/24	Review of mediation status and scheduling and follow up.	John Lyons	0.60	1,077.00
10/07/24	Emails with J. Lyons and J. King regarding settlement negotiations and mediation (0.4).	Jeffrey S. Torosian	0.40	656.00
10/08/24	Emails with J. Lyons and J. King regarding settlement negotiations, mediation, and scheduling of same.	Jeffrey S. Torosian	0.60	984.00
10/08/24	Call with A. Troop (.4) and coordination regarding mediation (.9).	John Lyons	1.30	2,333.50
10/09/24	Follow up with parties regarding mediation and scheduling.	John Lyons	0.90	1,615.50
10/10/24	Emails and conference with J. Lyons and J. King regarding mediation (0.4); confer with J. King regarding same (0.2).	Jeffrey S. Torosian	0.60	984.00
10/15/24	Follow with mediator (.3), parties (.3) and mediation strategy (.6).	John Lyons	1.20	2,154.00
10/16/24	Review	Devin J. Carpenter	1.60	1,752.00
10/16/24	Analyze .	Joe Roselius	0.50	652.50
10/17/24	Review research, summary and analysis from J. Roselius and D. Carpenter on	Jeffrey S. Torosian	0.90	1,476.00
10/17/24	Review J. Lyons' email to M. Ciatti regarding Mediation.	Jeffrey S. Torosian	0.10	164.00
10/17/24	Follow up regarding mediation and strategies (1.8); outreach to CAVIC (.4), outreach to Jetcraft (.6); call with trustee (.3).	John Lyons	2.70	4,846.50
10/18/24	Emails with J. King and J. Lyons regarding mediation.	Jeffrey S. Torosian	0.30	492.00
10/28/24	Follow with mediator and parties regarding mediation (1.1) and review and formulation of settlement strategies, claims pool and related matters (1.8).	John Lyons	2.90	5,205.50

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10/28/24	Emails with M. Ciatti and J. Lyons regarding finalizing details on Mediation (0.7); review email from J. Lyons to R. Kaiser regarding Mediation and briefing schedules (0.1); emails with J. Roselius regarding Mediation planning (0.2); confer with J. King regarding Mediation (0.1); emails with J. King and J. Lyons regarding same (0.2).	Jeffrey S. Torosian	1.30	2,132.00
10/28/24	Correspond with mediator and J. Lyons and J. Torosian re settlement conference.	Joe Roselius	0.20	261.00
10/30/24	Receipt and review of Order resetting briefing schedule (0.1); emails with W. Countryman and J. Lyons regarding same (0.1).	Jeffrey S. Torosian	0.20	328.00
10/30/24	Analyze order re-setting deadlines.	Joe Roselius	0.10	130.50
10/31/24	Follow up regarding mediation orders and schedules.	John Lyons	1.10	1,974.50
11/01/24	Emails with all counsel regarding Mediation.	Jeffrey S. Torosian	0.50	820.00
11/01/24	Receipt and review of notices and Court Orders regarding appeal briefing schedules (0.3); emails with W. Countryman regarding same (0.2).	Jeffrey S. Torosian	0.50	820.00
11/01/24	Correspond with Bombardier and CAVIC counsel re mediation.	Joe Roselius	0.30	391.50
11/01/24	Review of appeal extensions and mediation orders.	John Lyons	0.70	1,256.50
11/04/24	Correspond with opposing counsel regarding mediation.	Joe Roselius	0.30	391.50
11/04/24	Emails with all counsel regarding call to discuss mediation process (0.6); emails with J. Lyons regarding same (0.2).	Jeffrey S. Torosian	0.80	1,312.00
11/04/24	Review of mediation issues including form of report (.7) and preparation for group parties call (.2).	John Lyons	0.90	1,615.50
11/05/24	Emails and conferences with J. Lyons regarding discussions with all counsel on mediation.	Jeffrey S. Torosian	0.80	1,312.00
11/05/24	Emails with W. Countryman and J. Lyons regarding 9th Circuit's scheduling orders.	Jeffrey S. Torosian	0.50	820.00
11/05/24	Correspond with J. Lyons and J. Torosian regarding mediation submission (.2); call with A. Troop, B. Beckerman, B. Labate, J. Lyons regarding mediation (.3).	Joe Roselius	0.50	652.50
11/05/24	Call with counsel regarding mediation statements (.5) and gathered precedent regarding the same (.8).	John Lyons	1.30	2,333.50
11/06/24	Email from A. Troop regarding Mediation procedures (0.1); confer with J. Lyons regarding preparation of Mediation statement (0.4).	Jeffrey S. Torosian	0.50	820.00
11/06/24	Review (1.1) and began to draft mediation statement (2.4).	John Lyons	3.50	6,282.50
11/07/24	Develop mediation statement.	Joe Roselius	0.50	652.50
11/07/24	Email from A. Troop to Mediator regarding Mediation.	Jeffrey S. Torosian	0.10	164.00

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11/07/24	Continue to draft mediation statement outline, calculations of settlement amounts and distribution metrics, and review of past	John Lyons	6.70	12,026.50
11 /00 /24	submissions.	Loo Dogoliya	0.50	65250
11/08/24	Correspond with J. Lyons, J. Torosian, and the Trustee regarding settlement strategy.	Joe Roselius	0.50	652.50
11/08/24	Emails from Mediator and A. Troop regarding Mediation (0.2); receipt and review of Court Order regarding Mediation (0.1).	Jeffrey S. Torosian	0.30	492.00
11/08/24	Emails from J. Lyons regarding planning and possible next steps in Bankruptcy Court.	Jeffrey S. Torosian	0.20	328.00
11/09/24	Emails with J. King and J. Lyons regarding mediation.	Jeffrey S. Torosian	0.50	820.00
11/09/24	Revisions to mediation statement (2.3); review of developments regarding court issues, mediation points and issues and refined settlement strategy (3.2).	John Lyons	5.50	9,872.50
11/09/24	Review of mediation order (.4) and call with J. King (.3) revisions to mediation statement (2.5).	John Lyons	3.20	5,744.00
11/10/24	Email from J. Lyons regarding mediation statement.	Jeffrey S. Torosian	0.10	164.00
11/11/24	Work on mediation statement (3.5); conference with J. Lyons and J. Torosian re same. (.5).	Joe Roselius	4.00	5,220.00
11/11/24	Emails with B. Beckerman and all counsel regarding Mediation (0.2); meeting with and instructions to J. Lyons and J. Roselius regarding Mediation Statement (0.5); review and comment on drafts of same (2.0); several emails with J. Lyons, J. Roselius, et al., regarding Mediation Statement (0.9); emails with Mediator and all counsel regarding Mediation (0.2).	Jeffrey S. Torosian	3.80	6,232.00
11/11/24	Response to Pillsbury regarding mediation logistics (.2); continued to revise and finalize mediation statement (3.9); call with J. King and J. Torosian regarding the same (.5); transmittal to mediator (.1); analysis of claims and distribution outcomes in preparation for mediation (2.3).	John Lyons	7.00	12,565.00
11/12/24	Correspond with J. Torosian and D. Carpenter re mediation strategy and preparation.	Joe Roselius	0.30	391.50
11/12/24	Review of Amended Complaint, District Court Opinion, PowerPoint presentation, and background notes and prepare for Mediation.	Jeffrey S. Torosian	5.00	8,200.00
11/12/24	Working dinner with trustee in preparation for mediation.	John Lyons	2.00	3,590.00
11/13/24	Calls and correspondence with mediator and J. Lyons, J. Torosian, and the Trustee regarding various issues arising in mediation.	Joe Roselius	2.40	3,132.00
11/13/24	Attend Mediation.	Jeffrey S. Torosian	11.00	18,040.00
11/13/24	Preparation for (1.5) and participation in mediation (8.0) and preparation for next day's session (2.0).	John Lyons	11.50	20,642.50
11/13/24	Research	Devin J. Carpenter	0.50	547.50

11/14/24	Compile outstanding Chapter 7 professional fees and expenses (1.60); emails with J. Lyons regarding same (.10).	William L. Countryman	1.70	875.50
11/14/24	Attend Mediation (7.0); emails with J. Roselius with Mediation summary and next steps on Mediation (0.3).	Jeffrey S. Torosian	7.30	11,972.00
11/14/24	Continued participation in mediation.	John Lyons	10.50	18,847.50
11/15/24	Email from J. Lyons regarding settlement negotiations and next steps.	Jeffrey S. Torosian	0.10	164.00
11/20/24	Review of updated claims metrics, settlement and recovery scenarios and refined settlement strategies.	John Lyons	2.00	3,590.00
11/22/24	Email from J. Lyons with email from Mediator regarding status of settlement negotiations and next steps.	Jeffrey S. Torosian	0.10	164.00
11/22/24	Follow up with R. Kaiser regarding mediation.	John Lyons	0.20	359.00
11/25/24	Call with R. Kaiser regarding mediation.	John Lyons	0.50	897.50
11/26/24	Strategize on settlement negotiations and next steps on same (1.2); confer with J. King regarding same (0.2); emails with J. Lyons and J. King regarding same (0.3).	Jeffrey S. Torosian	1.70	2,788.00
11/26/24	Email from B. Beckerman requesting extension of briefing schedule (0.1); emails with J. Lyons, et al., regarding briefing deadlines and extensions to same (0.4); strategize on appeal briefing and case management (1.2); confer with J. Roselius regarding same and next steps (0.4).	Jeffrey S. Torosian	2.10	3,444.00
11/26/24	Drafted and sent email to mediator regarding Bombardier extension request.	John Lyons	0.50	897.50
11/26/24	Correspond with Trustee, J. Lyons, and J. Torosian regarding mediation status.	Joe Roselius	0.10	130.50
11/26/24	Correspond with J. Lyons, mediator, and Bombardier counsel regarding extension of briefing schedule.	Joe Roselius	0.20	261.00
11/29/24	Analyze scheduling order regarding mediation and briefing deadlines.	Joe Roselius	0.10	130.50
11/29/24	Receipt and review of Court Orders resetting appeal briefing schedules.	Jeffrey S. Torosian	0.40	656.00
12/02/24	Review, download Amended Briefing Order and update calendar with dates from same.	William L. Countryman	0.20	103.00
12/03/24	Emails with J. King and J. Lyons regarding status of settlement negotiations and next steps on same.	Jeffrey S. Torosian	0.20	328.00
12/03/24	Correspond with Trustee regarding mediation.	Joe Roselius	0.10	130.50
12/08/24	Correspond with Trustee and J. Lyons regarding update from mediator.	Joe Roselius	0.10	130.50
12/08/24	Email from J. Lyons regarding communications with Mediator on next steps with respect to Mediation.	Jeffrey S. Torosian	0.10	164.00
12/13/24	Review of .	John Lyons	2.80	5,026.00

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12/17/24	Receipt and review of Tentative Rulings for status hearing (0.1); emails with W. Countryman, J. Lyons, et al., regarding same and planning for status hearing (0.4).	Jeffrey S. Torosian	0.50	820.00
12/18/24	Court appearance for status conference (1.0); confer with J. Lyons regarding same (0.2).	Jeffrey S. Torosian	1.20	1,968.00
12/18/24	Analyze relevant settlement strategy alternatives and next steps (0.8); confer with J. Lyons regarding same (0.4); emails from Mediator and J. Lyons regarding Mediation (0.1).	Jeffrey S. Torosian	1.30	2,132.00
12/20/24	Receipt, review, analyze, and comment on Mediator's proposal for Mediation (1.3); emails with J. Lyons and J. King regarding same (0.8).	Jeffrey S. Torosian	2.10	3,444.00
12/20/24	Analyze mediator's proposal and correspond with J. Lyons, J. Torosian, and Trustee regarding same.	Joe Roselius	0.80	1,044.00
12/20/24	Review of mediator's proposal (.3) call with trustee (.5), review of calculations/sensitivity analyses (1.6); prepared analysis (2.9); review and analysis of Li Qi settlement and mediator proposal (.5).	John Lyons	5.80	10,411.00
12/21/24	Follow-up emails with J. Lyons and J. King regarding Mediator's proposal for Mediation.	Jeffrey S. Torosian	0.40	656.00
01/02/25	Analyze settlement strategy and next steps on Mediator's proposal (0.7); emails with J. King and J. Lyons regarding same (0.2).	Jeffrey S. Torosian	0.90	1,701.00
01/02/25	Correspond with J. Lyons, J. Torosian, and Trustee regarding mediator's proposal.	Joe Roselius	0.20	301.00
01/03/25	Receipt and review of Order and notice rescheduling appeal briefing schedule.	Jeffrey S. Torosian	0.20	378.00
01/03/25	Confer with J. King and J. Lyons regarding settlement negotiations and next steps with respect to Mediator's proposal (0.5); review Mediator Term Sheet and comments to same (0.6); emails with J. Lyons and J. King regarding same and latest communication from Mediator on scheduling (0.4).	Jeffrey S. Torosian	1.50	2,835.00
01/03/25	Correspond with J. Lyons, J. Torosian, and Trustee regarding mediator's proposal.	Joe Roselius	0.10	150.50
01/03/25	Review mediation updates and assessment of settlement amount (.8); communication with mediator (.3).	John Lyons	1.10	2,255.00
01/06/25	Review Amended 9th Circuit Scheduling Order and revise calendar with new dates.	William L. Countryman	0.30	171.00
01/15/25	Review of issues regarding	John Lyons	3.40	6,970.00
01/15/25	Emails with J. Lyons and Mediator regarding Mediator's proposal (0.2); analyze settlement and claims strategy and confer with J. Lyons regarding same (0.8).	Jeffrey S. Torosian	1.00	1,890.00
01/15/25	Correspond with J. Lyons and mediator regarding proposal.	Joe Roselius	0.20	301.00
01/17/25	Correspond with J. Lyons and mediator regarding proposal.	Joe Roselius	0.20	301.00

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01/17/25	Emails and calls with J. Lyons and J. King regarding Mediation settlement negotiations, strategy, and next steps (1.0); emails with Mediator and J. Lyons regarding same (0.2).	Jeffrey S. Torosian	1.20	2,268.00
01/17/25	Review of mediation updates and acceptance of proposal (1.1) call with trustee (.5) and developed next steps and settlement scenarios (.9).	John Lyons	2.50	5,125.00
01/18/25	Updates to parties regarding settlement (.8) and worked on calculations regarding distributions (.4).	John Lyons	1.20	2,460.00
01/27/25	Analyze open issues and settlement status and strategy and formulate next steps on same (1.5); confer with J. King regarding same (0.4).	Jeffrey S. Torosian	1.90	3,591.00
02/02/25	Emails with J. King and J. Lyons regarding status of settlement documentation and next steps on same.	Jeffrey S. Torosian	0.50	945.00
02/03/25	Retrieve, email settlement agreements to J. Lyons (.30); research and email to J. Lyons regarding same (.50).	William L. Countryman	0.80	456.00
02/03/25	Update call with trustee and developed next steps.	John Lyons	1.00	2,050.00
02/03/25	Review of forms of settlement agreements, past Klein precedent and charted outline of key features.	John Lyons	4.30	8,815.00
02/05/25	Emails with J. Lyons regarding communications with Mediator and status and next steps on settlement documentation.	Jeffrey S. Torosian	0.40	756.00
02/05/25	Follow up with R. Kaiser regarding mediation (.2) and call with trustee (.1).	John Lyons	0.30	615.00
02/06/25	Review status of settlement negotiations and documentation and confer with J. Lyons regarding same, 9019 motion, strategy, and next steps.	Jeffrey S. Torosian	0.50	945.00
02/12/25	Emails with J. King and J. Lyons regarding status of settlement documentation (0.6); communications with Mediator regarding same, and next steps (0.4).	Jeffrey S. Torosian	1.00	1,890.00
02/13/25	Email from J. Lyons regarding status of settlement documentation and communications with Mediator regarding same (0.1); email from J. Lyons regarding Mediation and Order rescheduling briefing schedule on 9th Circuit appeal (0.1).	Jeffrey S. Torosian	0.20	378.00
02/13/25	Receipt and review of Order rescheduling briefing schedule on 9th Circuit appeal.	Jeffrey S. Torosian	0.20	378.00
02/13/25	Correspondence with J. Lyons regarding status of settlement.	Joe Roselius	0.10	150.50
02/13/25	Follow up regarding mediation (.1), discussions with trustee (.3) and review of settlement precedent (1.1).	John Lyons	1.50	3,075.00
02/14/25	Review Revised Mediator Order and calendar dates from same.	William L. Countryman	0.20	114.00
02/18/25	Review BAC/Jetcraft settlement agreement (0.5) and related POCs (0.5); correspondence with DLA team and co-counsel re next steps (0.3).	Gregory M. Juell	1.30	1,872.00

02/18/25	Revise settlement agreement (.40); correspond with Trustee, J. Lyons, and J. Torosian re same (.10).	Joe Roselius 0.50		752.50
02/18/25	Receipt of draft Settlement Agreement (0.1); emails with J. Lyons, et al., regarding same and next steps (0.4).	Jeffrey S. Torosian	0.50	945.00
02/18/25	Preliminary review of settlement agreement (1.1); gathered precedent in Zetta and other cases and review of precedent (2.3); call with trustee (.5).	John Lyons	3.90	7,995.00
02/19/25	Review claims in settlement agreement for completeness (.30); email to Omni team regarding same (.10).	William L. Countryman	0.40	228.00
02/19/25	Revise settlement agreement and correspond with Trustee, J. Lyons, and J. Torosian regarding same.	Joe Roselius	0.50	752.50
02/19/25	Call with G. Juell regarding 9019 motion (.5); draft 9019 motion (6.1), Discuss comments on motion with G. Juell (.5); draft declaration re. 9019 motion (1.7).	Desiree Moshayedi	8.80	7,876.00
02/19/25	Draft 9019 motion for Bombardier/Jetcraft (4.4) and correspondence with D. Moshayedi re same (0.5).	Gregory M. Juell	4.90	7,056.00
02/19/25	Review, revise, and comment on draft Settlement Agreement (2.0); emails with J. King, J. Lyons, and J. Roselius regarding same and next steps (1.2); email from W. Countryman regarding claims (0.1); emails and call with J. King regarding draft Settlement Agreement and next steps (0.7); emails and conferences with J. Lyons regarding same (0.6); receipt and review of revised draft of Settlement Agreement (0.9).	Jeffrey S. Torosian	5.50	10,395.00
02/19/25	Further review and comments to settlement agreement (2.1), review of (1.8), gathered internal comments (1.1) and developed strategies regarding approval (2.4).	John Lyons	7.40	15,170.00
02/20/25	Emails with Omni team, J. Lyons regarding defendants' claim information (.30); revise 9019 motion, settlement agreement (1.40); emails with G. Juell regarding same (.10).	William L. Countryman	1.80	1,026.00
02/20/25	Review and revise updated draft of Settlement Agreement (1.2); meeting with J. Lyons, J. King, and J. Roselius regarding same and next steps (1.0); emails with all counsel regarding settlement documentation and 9019 Motion and next steps on same (0.5); receipt, review, and consideration of draft attachment to Settlement Agreement and email from J. Lyons regarding same (0.4).	tion and and allement		5,859.00
02/20/25	Revise 9019 settlement motion.	Desiree Moshayedi	2.60	2,327.00
02/20/25	Strategy conference with Trustee re Jetcraft/Bombardier settlement (.8); revise draft settlement agreement (.5).	Joe Roselius	1.30	1,956.50

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02/20/25	Review and input of additional changes to settlement agreement (2.3); review of sensitivity analyses of distribution scenarios regarding payment dates, claims withdrawal, and other metrics (2.5); calls with trustee (1.1).	John Lyons 5		12,095.00
02/20/25	Revise draft 9019 motion (3.7) and accompanying declaration (1.3) and order (0.3); correspondence with D. Moshayedi re same (0.4).	Gregory M. Juell 5		8,208.00
02/21/25	Revise 9019 Motion (1.60); internal communications with G. Juell regarding same (.20).	William L. Countryman	1.80	1,026.00
02/21/25	Revise settlement agreement (.70); correspond with J. Lyons and J. Torosian re same (.30).	Joe Roselius	1.00	1,505.00
02/21/25	Receipt, review, and revise draft settlement dismissal orders (1.2); emails with J. Lyons, J. Roselius, et al., regarding same and next steps (1.1).	Jeffrey S. Torosian	2.30	4,347.00
02/21/25	Correspondence with J. Lyons re 9019 motion (0.3); correspondence with W. Countryman re same (0.3) and review revisions (0.5); revise same (0.4).	Gregory M. Juell	1.50	2,160.00
02/25/25	Revise notice section of 9019 Motion (.60); emails, call with J. Lyons, G. Juell regarding same (.50).	William L. Countryman	1.10	627.00
02/25/25	Analyze issues regarding (1.0); correspond with A. Troop, J. Lyons, J. Torosian, and Trustee regarding settlement agreement and draft 9019 motion (.5).	Joe Roselius	1.50	2,257.50
02/25/25	Analyze order regarding briefing schedule.	Joe Roselius	0.10	150.50
02/25/25	Revise draft 9019 motion (2.8) and correspondence with J. Lyons (0.2) and W. Countryman (0.3) re same.	Gregory M. Juell	3.30	4,752.00
02/25/25	Emails with J. King and J. Lyons regarding settlement agreement negotiations (0.2); emails with A. Troop and J. Lyons regarding 9019 motion (0.2); emails with J. Lyons, J. King, et al., regarding same and next steps (0.4); confer with J. Lyons regarding exhibits to settlement documentation (0.2); receipt and review of Orders on 9th Circuit briefing schedule (0.2); review research and email from J. Roselius regarding same (1.0).	Jeffrey S. Torosian	2.20	4,158.00
02/25/25	Preliminary review of draft 9019 (1.0); review of 9019 precedent in Zetta cases (ECN, Minsheng) (1.3); review and revisions to sensitivity analyses regarding settlement, terms timing (2.0); review of potential impact regarding UL (1.1).	John Lyons	5.40	11,070.00
02/26/25	Review revised Mediator's Order and calendar dates from same.	William L. Countryman	0.30	171.00
02/26/25	Review 9019 Motion (1.0); emails with J. King, J. Lyons, et al., regarding revisions to same (0.5).	Jeffrey S. Torosian	1.50	2,835.00
02/26/25	Revise draft 9019 motion (1.9) and correspondence with J. Lyons re same (0.3).	Gregory M. Juell	2.20	3,168.00

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02/26/25	Correspond with J. Torosian, J. Lyons, G. Juell, and Trustee regarding 9019 motion.	Joe Roselius	0.40	602.00
02/27/25	Revise formatting in 9019 motion (.80); emails with G. Juell regarding same (.10).	William L. Countryman	0.90	513.00
02/27/25	Research for motion. for settlement	Desiree Moshayedi	0.40	358.00
02/27/25	Analyze 9019 and Dismissal Order issues, strategy, and next steps (1.0); emails and conferences with J. Roselius, J. Lyons, et al., regarding same (0.6).	Jeffrey S. Torosian	1.60	3,024.00
02/27/25	Correspond with J. Torosian, J. Lyons, G. Juell and Trustee regarding revisions to 9019 motion and dismissal notices.	Joe Roselius	0.50	752.50
02/27/25	Revise draft 9019 motion per internal comments (2.6); review revised settlement agreement (0.3); correspondence with W. Countryman re same (0.2).	Gregory M. Juell	3.10	4,464.00
02/27/25	Revisions to 9019 motion and exhibits (2.2); review of (.5); review of (1.1).	John Lyons	3.80	7,790.00
02/28/25	Revise 9019 motion and notices of dismissal (1.0); call and correspond with J. Torosian, J. Lyons and Trustee regarding same. (.5).	Joe Roselius	1.50	2,257.50
02/28/25	Emails with J. Roselius, et al., regarding 9019 motion revisions and dismissal orders (1.0); review and revise 9019 motion and dismissal orders (1.8); confer with and instructions to J. Roselius regarding same (0.5); follow-up emails with J. Lyons, J. King, and J. Roselius regarding same (0.6).	Jeffrey S. Torosian	3.90	7,371.00
03/02/25	Review Settlement Agreement against list of Bombardier claims; email to J. Lyons regarding same.	William L. Countryman	0.20	114.00
03/03/25	Retrieve, email ECN settlement order to J. Roselius (.20); revise 9019 Motion regarding settlement with Jetcraft, Bombardier and proposed Notices of Dismissal (.60); emails with G. Juell regarding same (.10).	William L. Countryman	0.90	513.00
03/03/25	Review and comment on latest draft of 9019 motion and dismissal orders (1.2); emails with J. Roselius, J. Lyons, et al., regarding same (0.8); call with J. Lyons regarding 9019 motion (0.3); confer with and instructions to J. Roselius regarding same and draft order (0.2); follow-up emails with J. Roselius, G. Juell, et al., regarding same (0.7).	Jeffrey S. Torosian	3.20	6,048.00
03/03/25	Revise draft 9019 motion (2.3), declaration (1.2), and order (0.9); correspondence with J. Lyons re same (0.2).	Gregory M. Juell	4.60	6,624.00
03/03/25	Correspond with J. Torosian, J. Lyons, G. Juell, B. Countryman, and Trustee regarding 9019 motion and supporting papers. (.5); Correspond with J. Torosian, J. Lyons, G. Juell, B. Countryman, and Trustee regarding ECN 9019 order. (.3).	Joe Roselius	0.80	1,204.00

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03/03/25	Revisions to settlement documents (1.1); analysis and preparation for distribution metrics regarding released claims,	John Lyons	3.50	7,175.00
03/04/25	consideration timing and other factors (2.4). Review and comment on updated draft 9019 motion, draft Order, and King declaration (1.4); emails with J. King, J. Lyons, et al., regarding same (0.4).	Jeffrey S. Torosian	1.80	3,402.00
03/04/25	Revisions to 9019, declaration, and review of pleadings and precedent.	John Lyons	3.20	6,560.00
03/06/25	Revise 9019 declaration and motion per internal comments (0.6); email J. Lyons re same (0.2).	Gregory M. Juell	0.80	1,152.00
03/06/25	Further revisions and follow up to 9019 and attachments.	John Lyons	2.80	5,740.00
03/07/25	Revise 9019 order and motion per comments from J. Lyons.	Gregory M. Juell	0.50	720.00
03/07/25	Further revisions to 9019 package including declaration, calculations, timing issues and exhibits to orders,	John Lyons	2.30	4,715.00
03/10/25	Correspondence with J. Lyons re Bombardier settlement agreement and review revised version.	Gregory M. Juell	0.40	576.00
03/11/25	Correspond with Trustee regarding status of settlement.	Joe Roselius	0.10	150.50
03/11/25	Review revised settlement agreement for Jetcraft/BAC.	Gregory M. Juell	0.30	432.00
03/11/25	Continued review of 9019 timing issues, UL settlement and CAVIC settlement.	John Lyons	2.50	5,125.00
03/12/25	Emails with J. King and J. Lyons regarding settlement documentation and next steps on same.	Jeffrey S. Torosian	0.40	756.00
03/12/25	Correspond with Trustee, J. Lyons, and J. Torosian regarding status of settlement.	Joe Roselius	0.40	602.00
03/12/25	Communication with A. Troop.	John Lyons	0.50	1,025.00
03/12/25	Revisions to 9019 package.	John Lyons	1.50	3,075.00
03/13/25	Revise stipulations re. Jetcraft, Bombardier, and CAVIC settlement (.6); Call with G. Juell re. same (.2).	Desiree Moshayedi	0.80	716.00
03/13/25	Revise Stipulations to Dismiss Adversary and Appeal cases (.80); emails with G. Juell regarding same (.10).	William L. Countryman	0.90	513.00
03/13/25	Emails with J. Lyons, J. King, et al., regarding settlement documentation and next steps on same (0.5); email from A. Troop regarding settlement documentation (0.1); receipt and review of Bombardier's and Jetcraft's proposed changes to draft Settlement Agreement (0.6); emails from J. Lyons regarding same (0.2).	Jeffrey S. Torosian	1.40	2,646.00
03/13/25	Correspond with A. Troop, J. Lyons, and Trustee regarding revisions to 9019 motion and settlement agreement.	Joe Roselius	0.50	752.50

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03/13/25	Revise draft 9019 motion, declaration, and order per internal comments (2.2); review and revise draft exhibits/stipulated dismissals (1.1); correspondence with W. Countryman re same (0.3).	Gregory M. Juell	3.60	5,184.00
03/13/25	Review and changes to 9019 markup and transmittal to parties.	John Lyons	4.30	8,815.00
03/13/25	Follow up with mediator.	John Lyons	0.30	615.00
03/14/25	Review J. Lyons' email to Bombardier's and Jetcraft's counsels regarding revisions to Settlement Agreement (0.1); email from J. Lyons regarding negotiations on Settlement Agreement and communication with Mediator (0.2).	Jeffrey S. Torosian	0.30	567.00
03/14/25	Correspond with A. Troop, J. Lyons, and Trustee regarding revisions to 9019 motion and settlement agreement.	Joe Roselius	0.20	301.00
03/14/25	Review of markup of settlement agreement, changes, revisions to distribution scenarios and next steps.	John Lyons	2.70	5,535.00
03/14/25	Call with B. Kaiser regarding mediation.	John Lyons	0.30	615.00
03/19/25	Review settlement and 9019 issues (0.3); confer with J. Lyons regarding same (0.3).	Jeffrey S. Torosian	0.60	1,134.00
03/21/25	Emails with J. Lyons, J. King, and J. Roselius regarding settlement negotiations and communications with Mediator regarding same.	Jeffrey S. Torosian	0.50	945.00
03/21/25	Correspond with J. Lyons, J. Torosian, and Trustee regarding settlement negotiations.	Joe Roselius	0.40	602.00
03/21/25	Follow up with mediator (.3), review of revised distribution scenarios and calculations (1.0).	John Lyons	1.30	2,665.00
03/22/25	Email from C. Fornos regarding revised settlement documentation (0.1); review and comment on revised draft of Settlement Agreement and 9019 Motion (1.1); emails with J. Lyons, J. King, and J. Roselius regarding same (0.5).	Jeffrey S. Torosian	1.70	3,213.00
03/22/25	Revise settlement agreement and 9019 motion and correspond with J. Lyons, J. Torosian, and the Trustee regarding same.	Joe Roselius	0.40	602.00
03/22/25	Review of revised settlement agreement (.8); call with trustee (.3); revisions and assessed impact on interim distributions, funder alternatives (.9).	John Lyons	2.00	4,100.00
03/23/25	Emails with J. Roselius, J. Lyons, and J. King regarding Defendants' changes to Settlement Agreement and 9019 Motion.	Jeffrey S. Torosian	0.20	378.00
03/23/25	Revise settlement agreement and 9019 motion and correspond with J. Lyons, J. Torosian, and the Trustee re same.	Joe Roselius	0.30	451.50
03/24/25	Revise formatting of Settlement Agreement, Motion to Approve same (1.00); compile same for signatures by parties (.20); emails with G. Juell regarding same (.20).	William L. Countryman	1.40	798.00
03/24/25	Emails with J. Lyons, G. Juell, et al., regarding latest changes to Settlement Agreement and 9019 Motion and next steps on same.	Jeffrey S. Torosian	0.80	1,512.00

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03/24/25	Correspondence with W. Countryman re settlement agreement (0.2); review exhibits (0.5); review compiled version (0.4); review counter-party revisions to motion and incorporate same (0.8).	Gregory M. Juell	1.90	2,736.00
03/24/25	Correspond with J. Lyons, J. Torosian, and Trustee regarding settlement agreement and 9019 motion.	Joe Roselius	0.30	451.50
03/25/25	Revise draft settlement agreement and related motion (0.8); correspondence with J. Lyons re same (0.2).	Gregory M. Juell	1.00	1,440.00
03/26/25	Compile revised Settlement Agreement with exhibits; emails with G. Juell regarding same.	William L. Countryman	0.30	171.00
03/26/25	Confer with J. Lyons regarding status of negotiations of settlement documentation (0.4); review J. Lyons' email to all counsel with attached redlines of settlement documentation (0.5).	Jeffrey S. Torosian	0.90	1,701.00
03/26/25	Correspondence with J. Lyons re revised settlement agreement (0.5); revise exhibits (0.4).	Gregory M. Juell	0.90	1,296.00
03/26/25	Comprehensive review and final changes to settlement package and transmittal to parties (4.3); call with A. Troop (.5); call with trustee (.3).	John Lyons	5.10	10,455.00
03/31/25	Receipt and review of 9th Circuit Order and notice regarding appeal briefing schedule and settlement.	Jeffrey S. Torosian	0.20	378.00
03/31/25	Emails with J. King and J. Lyons regarding status of settlement negotiations and documentation and next steps on same.	Jeffrey S. Torosian	0.50	945.00

TOTAL TASK	559,085.50
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B195 Non-Working Travel

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
11/11/24	Travel to NYC for mediation.	Jeffrey S. Torosian	5.00	4,100.00
11/12/24	Travel to NYC for mediation.	John Lyons	5.50	4,936.25
11/15/24	Return travel from Mediation back to Chicago.	Jeffrey S. Torosian	5.00	4,100.00
11/15/24	Return travel to Chicago.	John Lyons	5.50	4,936.25

TOTAL TASK 18,0

TOTAL HOURS	351.90
TOTAL FEES	577,158.00

Timekeeper Summary

The following legal services were provided by DLA Piper LLP (US):

TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
John Lyons	Partner	74.00	2,050.00	151,700.00
Jeffrey S. Torosian	Partner	42.60	1,890.00	80,514.00
John Lyons	Partner	81.40	1,795.00	146,113.00
Jeffrey S. Torosian	Partner	46.50	1,640.00	76,260.00
Joe Roselius	Partner	11.50	1,505.00	17,307.50
Gregory M. Juell	Associate	36.00	1,440.00	51,840.00
Joe Roselius	Partner	11.00	1,305.00	14,355.00
Devin J. Carpenter	Associate	2.10	1,095.00	2,299.50
John Lyons	Partner	11.00	897.50	9,872.50
Desiree Moshayedi	Associate	12.60	895.00	11,277.00
Jeffrey S. Torosian	Partner	10.00	820.00	8,200.00
William L. Countryman	Paralegal	11.30	570.00	6,441.00
William L. Countryman	Paralegal	1.90	515.00	978.50
	FEES	351.90		577,158.00

Task Summary

TASK	DESCRIPTION	HOURS	AMOUNT
B190	Other Contested Matters (excluding assumption/rejection motions)	330.90	559,085.50
B195	Non-Working Travel	21.00	18,072.50
	TOTALS	351.90	577,158.00

Activity Summary

CODE	DESCRIPTION	HOURS	AMOUNT
3007	Settlement / Mediation	327.00	547,251.50
3020	General Coordination / Planning / Strategy / Analysis	21.50	25,308.50
3026	BBD Judgment DC Appeal Other	0.20	378.00
3037	BBD 9th Circuit Appeal Other	2.20	3,661.00
3038	BBD 9th Circuit Cross-Appeal Other	1.00	559.00
	TOTALS	351.90	577,158.00

Disbursements

DATE	DESCRIPTION	AMOUNT
11/11/24	Car Service/Taxi – Vendor: JEFFREY S. TOROSIAN Invoice#: 010070654832 Date: 12/12/2024 11/11/2024 - Travel to NY for Zetta/Jetcraft for Mediation	125.05
11/11/24	Car Service/Taxi – Vendor: JEFFREY S. TOROSIAN Invoice#: 010070654832 Date: 12/12/2024 11/11/2024 - Travel to NY for Zetta/Jetcraft for Mediation	161.40
11/12/24	Meals – Vendor: JOHN LYONS Invoice#: 010070531621 Date: 12/3/2024 11/12/2024 - Travel to New York for Zetta mediation	509.61
11/12/24	Car Service/Taxi – Vendor: JOHN LYONS Invoice#: 010070531621 Date: 12/3/2024 11/12/2024 - Travel to New York for Zetta mediation.	171.62
11/12/24	Internet Services – Vendor: JOHN LYONS Invoice#: 010070531621 Date: 12/3/2024 11/12/2024 - Travel to New York for Zetta mediation	21.95
11/12/24	Hotel – Vendor: JOHN LYONS Invoice#: 010070531621 Date: 12/3/2024 11/12/2024 - Travel to New York for Zetta mediation	647.25
11/12/24	Hotel – Vendor: JEFFREY S. TOROSIAN Invoice#: 010070654832 Date: 12/12/2024 11/12/2024 - Travel to NY for Zetta/Jetcraft for Mediation	1,035.67
11/12/24	Meals – Vendor: JEFFREY S. TOROSIAN Invoice#: 010070654832 Date: 12/12/2024 11/12/2024 - Travel to NY for Zetta/Jetcraft for Mediation	50.39
11/13/24	Hotel – Vendor: JEFFREY S. TOROSIAN Invoice#: 010070654832 Date: 12/12/2024 11/13/2024 - Travel to NY for Zetta/Jetcraft for Mediation	1,035.67
11/13/24	Meals – Vendor: JEFFREY S. TOROSIAN Invoice#: 010070654832 Date: 12/12/2024 11/13/2024 - Travel to NY for Zetta/Jetcraft for Mediation	774.02
11/13/24	Hotel – Vendor: JOHN LYONS Invoice#: 010070531621 Date: 12/3/2024 11/13/2024 - Travel to New York for Zetta mediation	681.39
11/14/24	Hotel – Vendor: JOHN LYONS Invoice#: 010070531621 Date: 12/3/2024 11/14/2024 - Travel to New York for Zetta mediation	568.24
11/14/24	Meals – Vendor: JOHN LYONS Invoice#: 010070531621 Date: 12/3/2024 11/14/2024 - Travel to New York for Zetta mediation	33.38
11/14/24	Meals – Vendor: JEFFREY S. TOROSIAN Invoice#: 010070654832 Date: 12/12/2024 11/14/2024 - Travel to NY for Zetta/Jetcraft for Mediation	79.08
11/14/24	Hotel – Vendor: JEFFREY S. TOROSIAN Invoice#: 010070654832 Date: 12/12/2024 11/14/2024 - Travel to NY for Zetta/Jetcraft for Mediation	787.81
11/15/24	Meals – Vendor: JEFFREY S. TOROSIAN Invoice#: 010070654832 Date: 12/12/2024 11/15/2024 - Travel to NY for Zetta/Jetcraft for Mediation	60.09
11/15/24	Meals – Vendor: JEFFREY S. TOROSIAN Invoice#: 010070654832 Date: 12/12/2024 11/15/2024 - Travel to NY for Zetta/Jetcraft for Mediation	19.22
11/15/24	Car Service/Taxi – Vendor: JOHN LYONS Invoice#: 010070531621 Date: 12/3/2024 11/15/2024 - Travel to New York for Zetta mediation	108.37
11/15/24	Car Service/Taxi – Vendor: JEFFREY S. TOROSIAN Invoice#: 010070654832 Date: 12/12/2024 11/15/2024 - Travel to NY for Zetta/Jetcraft for Mediation	125.05
11/15/24	Car Service/Taxi – Vendor: JEFFREY S. TOROSIAN Invoice#: 010070654832 Date: 12/12/2024 11/15/2024 - Travel to NY for Zetta/Jetcraft for Mediation	96.83
11/30/24	Delivery Services – Vendor: UNITED PARCEL SERVICE - UPS Invoice#: 09K9 Date: 11/30/2024 11-27-2024 UPS Next Day Air Saver 1Z6085591396155303 from Lisa Humanicki Chicago to Kari Bernardy CTP Medtronic MINNEAPOLIS	21.68
12/13/24	Out-of-Town Travel – Vendor: WELLS FARGO BANK Invoice#: TRVL_110124 Date: 12/13/2024 - OUT-OF-TOWN TRAVEL JOHN LYONS CLIENT MEETINGS LGA TICKET #0882228610	35.00
12/13/24	Air Fare – Vendor: WELLS FARGO BANK Invoice#: TRVL_110124 Date: 12/13/2024 AIR FARE JOHN LYONS CLIENT MEETINGS TRAVEL TO: CHICAGO/NEW YORK - LA GUARDIA 12-NOV-24 TICKET #7158984371	499.02

Case 2:17-bk-21386-BR Doc 2719-4 Filed 10/28/25 Entered 10/28/25 19:55:59 Desc Exhibit D-1 Page 46 of 60 June 17, 2025 | J. Lyons | Matter # 411031.003003 | Invoice # 883383317

DATE	DESCRIPTION	AMOUNT
12/13/24	Out-of-Town Travel – Vendor: WELLS FARGO BANK Invoice#: TRVL_110124 Date: 12/13/2024 - OUT-OF-TOWN TRAVEL JOHN LYONS CLIENT MEETINGS LGA TICKET #0882300911	5.00
12/13/24	Out-of-Town Travel – Vendor: WELLS FARGO BANK Invoice#: TRVL_110124 Date: 12/13/2024 - OUT-OF-TOWN TRAVEL JEFFREY TOROSIAN MEDIATION LGA TICKET #0882058633	35.00
12/13/24	Air Fare – Vendor: WELLS FARGO BANK Invoice#: TRVL_110124 Date: 12/13/2024 AIR FARE JEFFREY TOROSIAN MEDIATION TRAVEL TO: CHICAGO/NEW YORK - LA GUARDIA 11-NOV-24 TICKET #7158260059	514.87
02/21/25	Out-of-Town Travel – Vendor: JOHN LYONS Invoice#: 010072593477 Date: 3/3/2025 02/21/2025 - Zetta	24.00
02/24/25	Out-of-Town Travel – Vendor: JOHN LYONS Invoice#: 010072593477 Date: 3/3/2025 02/24/2025 - Zetta	24.00
03/30/25	Out-of-Town Travel – Vendor: JOHN LYONS Invoice#: 010073512884 Date: 4/14/2025 03/30/2025 - Zetta	10.00
	TOTAL DISBURSEMENTS	8,260,66

TOTAL THIS INVOICE	USD 585,418.66
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Universal Leader Invoice



DLA Piper (US) J. Lyons T 312-368-4000

PRIVILEGED AND CONFIDENTIAL

Jonathan King, Chapter 7 Trustee DLA Piper, LLC 444 West Lake Street Suite 900 Chicago, IL 60606

Client Name Jonathan King, Chapter 7 Trustee

Matter Name King v. Yuntian **Matter Number** 411031.003006

INVOICE # 883383319
Invoice Date June 13, 2025

For Professional Services through March 31, 2025

Fees 42,708.00
Disbursements 0.00

TOTAL THIS INVOICE USD 42,708.00

Please remit payment by July 13, 2025

Please send remittance instructions to accounts@us.dlapiper.com

Pay Online Pay online	Click the "Pay online" button or visit https://paymentportal.dlapiper.com to make a payment online using your bank account or credit card	The invoice number 883383319 and invoice amount 42708.00 is required for access to the payment center.
Payment via Wire/ACH	Wells Fargo Bank, N.A. 1700 K Street, NW, 9th Floor Washington, DC 20006 Account Name: DLA Piper LLP (US)	To ensure proper credit, please indicate the invoice number(s) on the wire or ACH
	Account No.: 4053611935 ABA Transit No.: 121000248 Swift Code: WFBIUS6S	Law Firm Tax Identification No.: 52-0616490
Payment via Check to Lockbox	DLA Piper LLP (US) P.O. Box 780528 Philadelphia, PA 19178-0528	Please do not send checks to firm office address.

FEE DETAIL

The following legal services were provided by DLA Piper LLP (US):

B190 Other Contested Matters (excluding assumption/rejection motions)

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/09/24	Review of UL claims, theories, documents regarding mediation.	John Lyons	3.10	5,564.50
10/30/24	Analyze order re-setting deadlines.	Joe Roselius	0.10	130.50
10/30/24	Review Order Amending Briefing Schedule and calendar same.	William L. Countryman	0.30	154.50
11/01/24	Review 9th Circuit appeal docket and update calendar with revised briefing schedule (.20); emails with J. Lyons, J. Torosian regarding same (.20); emails with docketing regarding noticing for team (.30).	William L. Countryman	0.70	360.50
11/12/24	Call with J. Lyons, B. Condon, M. Mintz regarding outstanding claims (.40); follow-up call with J. Lyons (.10).	William L. Countryman	0.50	257.50
11/13/24	Update call with B. Mintz regarding mediation.	John Lyons	0.50	897.50
11/15/24	Update call with B. Mintz regarding mediation and settlement with Universal Leader.	John Lyons	0.80	1,436.00
11/21/24	Update call with B. Mintz.	John Lyons	0.30	538.50
11/26/24	Review and approval of extension stipulation.	John Lyons	0.50	897.50
11/26/24	Analyze stipulation re attorney fee's motion and correspond with J. Lyons, J. Torosian, and UL counsel re same.	Joe Roselius	0.20	261.00
11/26/24	Review email from B. Condon regarding continuation of hearing date on UL's fee request (0.1); review and approve draft Stipulation from B. Condon continuing hearing on attorneys' fees (0.5); emails with J. Lyons regarding same (0.2).	Jeffrey S. Torosian	0.80	1,312.00
11/27/24	Correspond with J. Lyons and R. Trombley re stipulation to extend briefing dates.	Joe Roselius	0.10	130.50
11/27/24	Receipt and review of Court-filed Stipulation to reschedule hearing date on Motion for Fees.	Jeffrey S. Torosian	0.10	164.00
11/29/24	Analyze scheduling order re mediation and briefing deadlines.	Joe Roselius	0.10	130.50
12/02/24	Review, download Amended Briefing Order and update calendar with dates from same.	William L. Countryman	0.20	103.00
12/03/24	Review extension stipulation.	John Lyons	0.20	359.00
12/13/24	Review of settlement issues and next steps.	John Lyons	3.00	5,385.00
12/17/24	Preliminary review of settlement agreement (.8), issues (1.9) and (1.3).	John Lyons	4.80	8,616.00

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June 13, 2025 | J. Lyons | Matter # 411031.003006 | Invoice # 883383319

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42,708.00

42,708.00

12/18/24	Receipt and review of emails from R. Trombley and J. Lyons regarding settlement negotiations with draft Settlement Agreement (0.6); confer with J. Lyons regarding same, strategy, and next steps (0.5).	Jeffrey S. Torosian	1.10	1,804.00
12/18/24	Analyze and revise draft settlement agreement.	Joe Roselius	0.50	652.50
12/24/24	Analyze notice of withdrawal of M. Bernstein and correspond with J. Torosian, J. Lyons, and Trustee re same.	Joe Roselius	0.10	130.50
12/24/24	Receipt and review of Court notices regarding M. Bernstein's withdrawal (0.2); emails with J. Roselius, J. King, and J. Lyons regarding same (0.2).	Jeffrey S. Torosian	0.40	656.00
12/25/24	Emails with J. King, J. Roselius, and J. Lyons regarding M. Bernstein's withdrawal.	Jeffrey S. Torosian	0.20	328.00
12/30/24	Review of (2.3) and issues (2.1).	John Lyons	4.60	8,257.00
01/03/25	Receipt and review of Order and notice rescheduling appeal briefing schedule (0.2).	Jeffrey S. Torosian	0.20	378.00
01/06/25	Review Amended 9th Circuit Scheduling Order and revise calendar with new dates.	William L. Countryman	0.30	171.00
02/07/25	Retrieve, email UL briefs to G. Juell.	William L. Countryman	0.40	228.00
02/13/25	Receipt and review of Order rescheduling briefing schedule on 9th Circuit appeal.	Jeffrey S. Torosian	0.10	189.00
02/14/25	Review Revised Mediator Order and calendar dates from same.	William L. Countryman	0.20	114.00
02/14/25	Update to B. Mintz.	John Lyons	0.10	205.00
02/26/25	Review revised Mediator's Order and calendar dates from same.	William L. Countryman	0.30	171.00
03/18/25	Update call with B. Mintz.	John Lyons	0.50	1,025.00
03/21/25	Emails with J. Lyons, J. King, J. Roselius regarding settlement negotiations and case management.	Jeffrey S. Torosian	0.50	945.00
03/28/25	Receipt and review of 9th Circuit Order and notice regarding appeal briefing schedule and settlement.	Jeffrey S. Torosian	0.20	378.00
03/31/25	Receipt and review of 9th Circuit Order and notice regarding appeal briefing schedule and settlement.	Jeffrey S. Torosian	0.20	378.00

TOTAL HOURS	26.20

TOTAL TASK

TOTAL FEES

Timekeeper Summary

The following legal services were provided by DLA Piper LLP (US):

TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
John Lyons	Partner	0.60	2,050.00	1,230.00
Jeffrey S. Torosian	Partner	1.20	1,890.00	2,268.00
John Lyons	Partner	17.80	1,795.00	31,951.00
Jeffrey S. Torosian	Partner	2.60	1,640.00	4,264.00
Joe Roselius	Partner	1.10	1,305.00	1,435.50
William L. Countryman	Paralegal	1.20	570.00	684.00
William L. Countryman	Paralegal	1.70	515.00	875.50
	FEES	26.20		42,708.00

Task Summary

TASK	DESCRIPTION	HOURS	AMOUNT
B190	Other Contested Matters (excluding assumption/rejection motions)	26.20	42,708.00
	TOTA	LS 26.20	42,708.00

Activity Summary

CODE	DESCRIPTION	HOURS	AMOUNT
6004	UL MTD DC Appeal Other	0.90	1,476.00
6029	UL MTD 9th Circuit Appeal Other	25.30	41,232.00
	TOTALS	26.20	42,708.00

TOTAL THIS INVOICE	USD 42,708.00
TOTAL THIS INVOICE	USD 42,708.00

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CAVIC Invoice



DLA Piper (US) J. Lyons T 312-368-4000

883383318

PRIVILEGED AND CONFIDENTIAL

Jonathan King, Chapter 7 Trustee DLA Piper, LLC 444 West Lake Street Suite 900 Chicago, IL 60606

Client Name Jonathan King, Chapter 7 Trustee

Matter Name King V. CAVIC **Matter Number** 411031.003005

Invoice Date June 13, 2025

INVOICE #

For Professional Services through March 31, 2025

 Fees
 39,074.50

 Disbursements
 0.00

 TOTAL THIS INVOICE
 USD 39,074.50

Please remit payment by July 13, 2025

Please send remittance instructions to accounts@us.dlapiper.com

Please St	end remittance instructions to <u>accounts t</u>	<u>pus.uiapiper.com</u>
Pay Online Pay online	Click the "Pay online" button or visit https://paymentportal.dlapiper.com to make a payment online using your bank account or credit card	The invoice number 883383318 and invoice amount 39074.50 is required for access to the payment center.
Payment via Wire/ACH	Wells Fargo Bank, N.A. 1700 K Street, NW, 9th Floor Washington, DC 20006 Account Name: DLA Piper LLP (US)	To ensure proper credit, please indicate the invoice number(s) on the wire or ACH
	Account No.: 4053611935 ABA Transit No.: 121000248 Swift Code: WFBIUS6S	Law Firm Tax Identification No.: 52-0616490
Payment via Check to Lockbox	DLA Piper LLP (US) P.O. Box 780528 Philadelphia, PA 19178-0528	Please do not send checks to firm office address.

FEE DETAIL

The following legal services were provided by DLA Piper LLP (US):

B190 Other Contested Matters (excluding assumption/rejection motions)

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/08/24	Revise draft appellate brief.	Gregory M. Juell	1.90	2,308.50
10/09/24	Revise draft appellate brief.	Gregory M. Juell	1.40	1,701.00
10/09/24	Review of recent caselaw regarding (1.4), review of brief structure and outline (.9).	John Lyons	2.30	4,128.50
10/11/24	Correspond with J. Torosian and J. Lyons re briefing schedule.	Joe Roselius	0.20	261.00
10/14/24	Review appeal briefing schedule and mediation implications on same (0.2); emails with J. Lyons and W. Countryman regarding same (0.2).	Jeffrey S. Torosian	0.40	656.00
10/14/24	Correspond with J. Torosian and J. Lyons re briefing schedule.	Joe Roselius	0.20	261.00
10/15/24	Review of and assessed impact on appeal.	John Lyons	1.20	2,154.00
10/30/24	Review Order Amending Briefing Schedule and calendar same.	William L. Countryman	0.30	154.50
11/01/24	Review 9th Circuit appeal docket and update calendar with revised briefing schedule (.20); emails with J. Lyons, J. Torosian regarding same (.20); emails with docketing regarding noticing for team (.30).	William L. Countryman	0.70	360.50
11/13/24	Create chart of (2.10); emails with J. Lyons regarding same (.10); calculate (.40); emails with J. Lyons regarding same (.10).	William L. Countryman	2.70	1,390.50
12/02/24	Review, download Amended Briefing Order and update calendar with dates from same.	William L. Countryman	0.20	103.00
12/14/24	Review of CAVIC brief, issues, underlying opinions and appellate strategies.	John Lyons	4.10	7,359.50
01/06/25	Review Amended 9th Circuit Scheduling Order and revise calendar with new dates.	William L. Countryman	0.30	171.00
01/06/25	Review of CAVIC appeal briefs.	John Lyons	2.30	4,715.00
01/10/25	Review of cases, updated research and district court briefs.	John Lyons	2.50	5,125.00
02/14/25	Review Revised Mediator Order and calendar dates from same.	William L. Countryman	0.20	114.00
02/25/25	Analyze order re briefing schedule.	Joe Roselius	0.10	150.50
02/26/25	Review revised Mediator's Order and calendar dates from same.	William L. Countryman	0.30	171.00
03/14/25	Follow up regarding claims information.	John Lyons	0.30	615.00

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June 13, 2025 | J. Lyons | Matter # 411031.003005 | Invoice # 883383318

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03/18/25	Review of briefs and formulated strategy regarding new revised brief.	John Lyons	3.50	7,175.00
		TOTAL TASK		39,074.50
		TOTAL HOURS		25.10
		TOTAL FEES		39,074.50

Timekeeper Summary

The following legal services were provided by DLA Piper LLP (US):

TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
John Lyons	Partner	8.60	2,050.00	17,630.00
John Lyons	Partner	7.60	1,795.00	13,642.00
Jeffrey S. Torosian	Partner	0.40	1,640.00	656.00
Joe Roselius	Partner	0.10	1,505.00	150.50
Joe Roselius	Partner	0.40	1,305.00	522.00
Gregory M. Juell	Associate	3.30	1,215.00	4,009.50
William L. Countryman	Paralegal	0.80	570.00	456.00
William L. Countryman	Paralegal	3.90	515.00	2,008.50
	FEES	25.10		39,074.50

Task Summary

TASK	DESCRIPTION		HOURS	AMOUNT
B190	Other Contested Matters (excluding assumption/rejection motions)		25.10	39,074.50
		TOTALS	25.10	39,074.50

Activity Summary

CODE	DESCRIPTION	HOURS	AMOUNT
5018	General Coordination / Planning / Strategy / Analysis	2.70	1,390.50
5025	MTD 9th Circuit Appeal Appellant Brief	19.50	35,281.50
5030	MTD 9th Circuit Appeal Other	2.90	2,402.50
	TOTALS	25.10	39,074.50

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June 13, 2025 | J. Lyons | Matter # 411031.003005 | Invoice # 883383318

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TOTAL THIS INVOICE

USD 39,074.50

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Dragon Pearl Invoices



DLA Piper (US) J. Lyons T 312-368-4000

PRIVILEGED AND CONFIDENTIAL

Jonathan King, Chapter 7 Trustee DLA Piper, LLC 444 West Lake Street Suite 900 Chicago, IL 60606 INVOICE # 883383315
Invoice Date June 13, 2025

Client Name Jonathan King, Chapter 7 Trustee

Matter Name Jonathan King, Chapter 7 Trustee - Dragon Pearl Litigation

Matter Number 411031.003001

For Professional Services through March 31, 2025

Fees 33,366.00
Disbursements 0.00

TOTAL THIS INVOICE USD 33,366.00

Please remit payment by July 13, 2025

Please send remittance instructions to accounts@us.dlapiper.com

Pay Online Pay online	Click the "Pay online" button or visit https://paymentportal.dlapiper.com to make a payment online using your bank account or credit card	The invoice number 883383315 and invoice amount 33366.00 is required for access to the payment center.
Payment via Wire/ACH	Wells Fargo Bank, N.A. 1700 K Street, NW, 9th Floor Washington, DC 20006 Account Name: DLA Piper LLP (US)	To ensure proper credit, please indicate the invoice number(s) on the wire or ACH
	Account No.: 4053611935 ABA Transit No.: 121000248 Swift Code: WFBIUS6S	Law Firm Tax Identification No.: 52-0616490
Payment via Check to Lockbox	DLA Piper LLP (US) P.O. Box 780528 Philadelphia, PA 19178-0528	Please do not send checks to firm office address.

FEE DETAIL

The following legal services were provided by DLA Piper LLP (US):

B120 Asset Analysis and Recovery

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
11/07/24	Review and further comments to Dragon Pearl enforcement motion.	John Lyons	1.10	1,974.50
11/14/24	Additional revisions to DP enforcement motion and exhibits.	John Lyons	1.30	2,333.50
11/26/24	Review of revisions to DP enforcement motion and final changes.	John Lyons	2.10	3,769.50
11/26/24	Drafted email with attachments to N. Burkill regarding BVI enforcement.	John Lyons	1.50	2,692.50
12/04/24	Review of revisions to DP motion and affidavit and made additional changes.	John Lyons	1.20	2,154.00
12/09/24	Review of updated schedules to DP enforcement motion.	John Lyons	1.00	1,795.00
12/10/24	Follow up regarding DP materials to Arnold and Porter (.4) and call with B. Mintz (.3).	John Lyons	0.70	1,256.50
12/11/24	Final review of DP pleadings.	John Lyons	1.50	2,692.50
01/21/25	Follow up regarding hearing (.2) and approval and coordination with DLA Autralia regarding next steps (.3).	John Lyons	0.50	1,025.00
01/22/25	Coordination regarding communication with Australian court regarding execution of judgment.	John Lyons	0.30	615.00
03/26/25	Review of pleadings and declaration and transmittal to Australia.	John Lyons	2.00	4,100.00

B130 Asset Disposition

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
10/16/24	Detailed update to Arnold & Porter regarding Dragon Pearl and next steps.	John Lyons	2.80	5,026.00
10/18/24	Review and comments to Dragon Pearl disposition motion.	John Lyons	2.00	3,590.00

TOTAL TASK 8,616.0

B190 Other Contested Matters

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	DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT

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June 13, 2025 | J. Lyons | Matter # 411031.003001 | Invoice # 883383315

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02/01/25 Revise Lyons Affidavit regarding undertakings (.50); email to J. Lyons, R. Campbell regarding same (.10).	William L. Countryman	0.60	342.00
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TOTAL TASK	342.00
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TOTAL HOURS	
TOTAL FEES	33,366,00

Timekeeper Summary

The following legal services were provided by DLA Piper LLP (US):

TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
John Lyons	Partner	2.80	2,050.00	5,740.00
John Lyons	Partner	15.20	1,795.00	27,284.00
William L. Countryman	Paralegal	0.60	570.00	342.00
	FEES	18.60		33,366.00

Task Summary

TASK	DESCRIPTION	HOURS	AMOUNT
B120	Asset Analysis and Recovery	13.20	24,408.00
B130	Asset Disposition	4.80	8,616.00
B190	Other Contested Matters	0.60	342.00
	TOTALS	18.60	33,366.00

TOTAL THIS INVOICE	USD 33,366.00
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